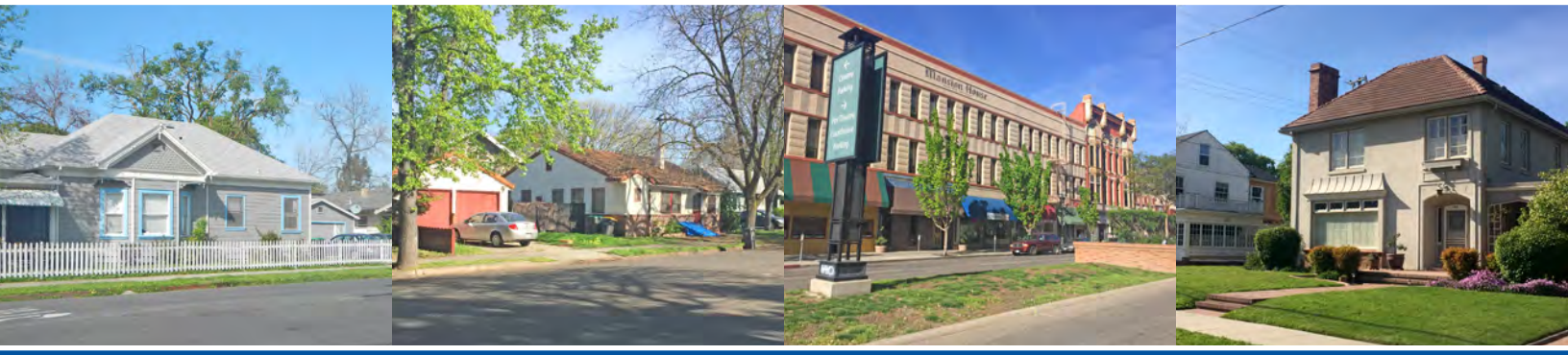
City of Stockton
2023-2031 Housing Element



Subsequent Draft, April 2024

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2023-2031 Housing Element

Subsequent Draft, April 2024

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HOUSING

This main element is divided into three sections:

- Introduction to the Policy Document
- Goals and Policies
- Implementation Programs and Quantified Objectives

INTRODUCTION TO THE POLICY DOCUMENT

Under California law, a housing element must include the community's goals, policies, quantified objectives, and housing programs for the maintenance, improvement, and development of housing.

This Housing Element includes nine goal statements. Under each goal statement are policies that amplify the goal statement. Implementation programs are listed after the policies and briefly describe the proposed action, City departments with primary responsibility for carrying out the program, funding source(s), and time frame for accomplishing the program.

The following definitions describe the nature of the statements of goals, policies, implementation programs, and quantified objectives as they are used in the Housing Element Policy Document:

- Goal: Ultimate purpose of an effort stated in a way that is general in nature and immeasurable.
- Policy: Specific statement guiding action and implying clear commitment.
- Implementation Program: An action, procedure, program, or technique that carries out policy. Implementation programs also specify primary responsibility for carrying out the action and an estimated time frame for its accomplishment. The time frame indicates the fiscal year in which the activity is scheduled to be completed. These time frames are general guidelines and may be adjusted based on City staffing and budgetary considerations.
- Quantified Objective: The number of housing units that the City expects to be constructed, conserved, or rehabilitated, or the number of households the City expects will be assisted through Housing Element programs based on available resources and general market conditions during the time frame of the Housing Element. Housing element law recognizes that in developing housing policies and programs, identified housing needs may exceed available resources and the community's ability to satisfy these needs. The quantified objectives of a housing element, therefore, need not be identical to the identified housing need,

but should establish the maximum number of housing units that can be constructed, rehabilitated, and conserved, or households assisted over an eight-year time frame.

GOALS, POLICIES, AND IMPLEMENTATION PROGRAMS

GOAL HE-1 AND ASSOCIATED POLICIES

GOAL HE-1: INCREASE HOUSING PRODUCTION AND ENSURE ADEQUATE LAND FOR ALL HOUSING TYPES AND INCOME LEVELS. INCREASE HOUSING PRODUCTION BY ENSURING ADEQUATE SITES FOR HOUSING OF ALL TYPES AND INCOMES, RECOGNIZING THE IMPORTANCE OF A JOBS-TO-HOUSING RATIO THAT ENCOURAGES LIVING AND WORKING IN OUR COMMUNITY.

Policy HE-1.1 Availability of Land: The City shall maintain sufficient designated and zoned vacant and underutilized sites for housing to achieve a mix of single-family and multifamily development that will accommodate anticipated population growth and the housing needs established in the City's regional housing needs allocation (RHNA) of 12,673 units (1,232 extremely low, 1,233 very low, 1,548 low, 2,572 moderate, 6,088 above moderate). In addition to the Housing Capacity sites needed toward RHNA, the Housing Action Plan (HAP) shall explore additional areas that could potentially support housing. This could include underutilized properties, underutilized buildings, and unincorporated areas. This surplus shall be used to maintain the City's Pro-Housing Designation that requires the City to maintain 30-percent surplus over the RHNA requirement. (Programs 1, 2 and 3)

Policy HE-1.2 Avoid Downzoning: The City shall not downzone parcels identified in the Housing Element inventory unless they are replaced concurrently by comparably zoned land elsewhere within the City, or the City makes the determination that there are still adequate sites in the inventory to meet the remaining regional housing needs allocation. (Program 1)

Policy HE-1.3 Parcel Consolidation: The City shall encourage the splitting or consolidation of parcels to facilitate more effective residential development and continue to process these requests ministerially. (Program 8)

Policy HE-1.4 Infrastructure and Public Facilities to Support Residential Development: The City shall take into consideration where housing is planned or likely to be built when preparing plans for capital improvements to expand or improve infrastructure and public facilities that support new residential development and ensure adequate services. The City shall also use the place-based strategy of identifying and targeting lower-income and high-poverty areas for prioritizing capital improvements related to infrastructure and public facilities, such as the South Stockton neighborhood, Downtown, and parts of the East Stockton and Pacific Avenue/Lincoln Village neighborhoods. (Program 4)

Policy HE-1.5 Higher Residential Densities: The City shall encourage residential densities at the high end of the allowable density range to make more efficient use of land and public facilities and services, and expand programs that would allow densities increase beyond the maximum allowable density range for projects that adhere to Housing Element policies. This includes the existing Supplemental Density Bonus program and new programs as part of the Development Code Overhaul. (Program 1 and 20)

Policy HE-1.6 Residential Mixed-Use Development: The City shall encourage the development of mixed-use residential-office and residential-retail projects. (Programs 2, 5, and 7)

Policy HE-1.7 Housing Variety: The City shall encourage and provide opportunities for a variety of housing types that provide market-rate and affordable housing opportunities and promote balanced mixed-income neighborhoods. The Development Code Update shall amend zoning to allow more housing variety and higher densities in various residential and commercial zones. (Program 5)

Policy HE-1.8 Accessory Dwelling Units in New and Existing Developments: The City shall encourage the development of accessory dwelling units within new and existing residential development and single-family neighborhoods. (Program 6)

Policy HE-1.9 Infill Development Targets: In an effort to meet the infill target of 4,400 new units in the Greater Downtown Area, the City shall promote infill development within the Downtown and Greater Downtown areas through incentives such as less restrictive height limits, less restrictive setback and parking requirements, subsidies, infrastructure improvements, and streamlined permitting process. (Programs 2 and 7)

Policy HE-1.10 Balanced Growth: The City shall ensure that development at the city's outskirts, particularly residential or mixed-use development, does not occur in a manner that is out of balance with infill development. (Program 7)

Policy HE-1.11 Transit Oriented Development: The City shall encourage higher-density residential uses and mixed-use development to locate near main transportation routes to offer an alternative means of transportation to employment centers, schools, shopping, and recreational facilities and to promote walking and biking. Consistent with the General Plan policies, the City will establish Transit Oriented Development overlays as part of the Development Code Update. (Programs 2, 5 and 7)

Policy HE-1.12 Adaptive Reuse: The City shall encourage the adaptive reuse of existing buildings for residential and mixed use. The HAP shall outline potential reuse sites in the downtown area and explore potential partnerships and resources to retrofit chronically vacant buildings for residential and mixed uses. (Program 2)

Policy HE-1.13 Public/Private Partnerships: The City shall strive to establish public-private partnerships for the revitalization of blighted areas. The HAP shall explore these partnerships and make recommendations on where these partnerships should be achieved to address existing barriers to new housing. (Program 5)

Policy HE-1.14 Pursue State Funding for Infill: The City shall pursue State funding to support infill development in the Downtown and Greater Downtown areas. (Program 7)

Policy HE-1.15 Improve the Downtown Image: The City shall strive to reshape the perception of Downtown Stockton as a livable city center. (Program 2)

Policy HE-1.16 Integrated Affordable Housing: The City shall encourage the integration of sites for affordable housing throughout the residentially designated areas of the city and avoid concentration of low-income housing units. (Programs 5 and 7)

Policy HE-1.17 Mixed Income Housing: The City shall encourage mixed income developments to create more economically diverse neighborhoods. (Programs 5 and 6)

Policy HE-1.18 Facilities and Services: The City shall provide, maintain, and upgrade, as necessary, community facilities and municipal services in support of residential development. (Program 4 and 31)

GOAL HE-1 IMPLEMENTATION PROGRAMS

Program 1. Adequate Sites Monitoring and No Net Loss. As part of the annual progress report on the Housing Element to the State, the City shall update its vacant land inventory, including an updated inventory of potential infill sites (smaller parcels). The City shall make the updated inventory available to the public and development community via the City's website. For any project approval on a Housing Element site for fewer housing units/or at lower densities than assumed in the Housing Element, the City shall determine whether there is still adequate capacity to meet the remaining housing need, consistent with "no net loss" state law. In addition, the City will track development approvals on sites in the inventory that allow non-residential uses. If projects approved on this type of site by December 31, 2027 are not in line with the City's non-residential RHNA projections in the inventory, within one year (by December 31, 2028) the City will identify additional sites to address the remaining RHNA and if necessary will rezone to make the sites available for residential development.

Quantified Objectives: Continue to maintain sufficient sites to address 12,673 units.

Potential Funding: General Fund

Who Is Responsible: Community Development Department, Economic Development Department

Time Frame: Update inventory annually as part of the Housing Element Annual Progress Report and assess "no net loss" as projects come forward on Housing Element sites. Assess project approvals on Housing Element inventory sites as of December 31, 2027. If approved projects are not in line with the City's non-residential RHNA projections in the inventory, within one year (by December 31, 2028) the City will identify additional sites beyond the sites in the inventory that allow non-residential uses in order to further facilitate residential development.

Program 2. Downtown Implementation: The City shall continue to implement measures to enable development of 4,400 residential units in the Greater Downtown Area by 2035, as laid out in the Climate Action Plan and General Plan. This will include strategies and regulations anticipated as part of the Comprehensive Development Code Update and Housing Action Plan (HAP) currently underway. The HAP shall specifically explore the following topics:

- Sufficient infrastructure capacity and estimated costs for develop all income types and densities.
- Market analysis to explore the opportunities and constraints of new housing in the greater downtown area.
- Cost gap analysis to better understand financial constraints in adaptive reuse of unused commercial buildings in the downtown area.
- Explore existing and potential funding mechanisms for infrastructure and building retrofitting.
- Explore potential partnerships for new housing and supportive services for all income types.

Quantified Objectives: 4,400 residential units in the Greater Downtown Area by 2040.

Potential Funding: General Fund

Who Is Responsible: Community Development Department, Economic Development Department

Time Frame: Adopt Comprehensive Development Code Update and HAP by April 2024; and annually thereafter to identify any additional strategies to address General Plan goals.

Program 3. Sites Included in Previous Housing Elements: As specified in Appendix A, some vacant parcels have been included in the land inventories of the 5th Cycle and 4th Cycle Stockton Housing Elements as suitable to address the City's RHNA allocation. Per Government Code Section 65583.2(c), to continue to include these parcels in that portion of the land inventory for this 6th Cycle Housing Element, the City will commit to update all required Development Code and General Plan provisions to allow projects that have at least 20 percent affordable units (extremely low, very low, or low) without discretionary review or "by right" (Government Code Section 65583.2 (i)).

Quantified Objectives: Units on repeat sites identified in Appendix A with lower income units that don't already allow residential development by right.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Update Development Code and, if needed, Land Use Element by December 31, 2026

Program 4. Public Facilities Repair and Replacement: Through implementation of the HUD Consolidated Plan, and upon funding availability, the City shall continue to use place-based strategies by identifying and targeting low-income neighborhoods for the expansion of existing facilities/infrastructure, replacement of deteriorating facilities, and construction of new facilities/infrastructure to increase quality of life for Stockton residents. To help identify these neighborhoods and facilities, the City shall update its Housing Conditions survey to better direct staff time and resources in identifying areas and facilities that could benefit the most.

Quantified Objectives: 5 public facility/ infrastructure projects, prioritizing lower-income, high-poverty neighborhoods such as the South Stockton neighborhood, Downtown, and parts of the East Stockton and Pacific Avenue/Lincoln Village neighborhoods.

Potential Funding: CDBG

Who Is Responsible: Economic Development Department, Community Development

Time Frame: Annually

Program 5. Housing and Neighborhood Action Plans: The City is currently preparing a Housing Action Plan (HAP) to provide a guidebook with information to interested developers and property owners about residential opportunities in the city. This plan will include the top priority sites the City has identified as "shovel-ready" for housing development. Selection of the priority sites will be based on financial feasibility analysis and policy goals. The HAP will be marketed and provided to potential developers upon completion. Implementation of the HAP will include marketing and incentivizing development of missing middle housing types including tiny homes, cottage homes, single-room occupancy units, duplexes, triplexes and fourplexes. All of these housing types are already allowed in the city. As detailed in Program 17, the city is proposing to expand where multi-unit residential (duplexes, triplexes and fourplexes) is allowed in the city as part of the Comprehensive Development Code Update. Incentivizing housing types such as single-room occupancy units and tiny homes is expected to create new housing opportunities for extremely low-income households.

The City is also preparing Neighborhood Action Plans for three (3) neighborhoods - South Airport Way Corridor, Little Manila/Gleason Park, and Cabral/East Cabral. The plans are focusing on eliminating barriers to housing construction and will result in recommended actions and strategies for each of the Neighborhood Areas. In particular, the Neighborhood Action Plans for Cabral Station Area and Little Manila/Gleason Park neighborhoods will serve as a tool to improve conditions and opportunities in these two primarily lower-income areas.

Quantified Objectives: Objective is that adoption of HAP will help facilitate permitting 1,000 residential units, prioritizing affordable housing in high-opportunity areas such as the Morada/Holman, Brookside/Country Club, Eight Mile/Bear Creek, and Midtown neighborhoods. Additional focus will be given to eliminating barriers to housing construction in lower-income areas such as the Cabral Station Area and Little Manila/Gleason Park neighborhoods.

Potential Funding: LEAP, REAP, General Fund

Who Is Responsible: Community Development Department

Time Frame: Neighborhood Action Plans by December 2023 and Housing Action Plan by April 2024

Program 6. Accessory Dwelling Units: The City will update its ADU regulations as needed throughout the planning period to address changes to State law. The City will encourage the construction of ADUs throughout the city through the following actions. These actions are aimed at providing an increased supply of affordable units and therefore help reduce

displacement risk for low-income households resulting from housing overpayment and facilitate mixed-income neighborhoods:

- Provide guidance and educational materials for building ADUs on the City's website, including permitting procedures and construction resources. The City already has preapproved/permit ready ADU plans available for use by homeowners. Additionally, the City will present homeowner associations with information about the community and neighborhood benefits of ADUs and inform them that covenants, conditions, and restrictions (CC&Rs) prohibiting ADUs are contrary to State law.
- Proactively advertise the benefits of ADUs by distributing multilingual informational materials in areas of high opportunity and limited rental opportunities to increase mobility for low-income households. This will be achieved by posting flyers in community gathering places and providing flyers to community groups and homeowners' associations at least annually.
- Monitor ADU production and affordability every other year and adjust or expand the focus of the education and outreach efforts. If needed, identify additional sites to accommodate the unmet portion of the lower-income RHNA.
- Apply annually, or as grants are available, for funding to provide incentives for homeowners to construct ADUs.
- Work with regional and local agencies to update existing ADU pre-approved construction plans and explore additional plans that reflect the housing market, cost constraints, and typical residential lots that could support them.

Quantified Objectives: Approve 180 ADUs over the course of the planning period, targeting areas of high opportunity, specifically the following neighborhoods - Brookside/Country Club, Weston Ranch, Eight Mile/Bear Creek, Midtown around the University of the Pacific (between I-5 and "Miracle Mile"/Pacific Avenue), western Upper Hammer/Thornton Rd, and eastern Morada/Holman.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: The City is currently updating the ADU regulations as part of the Comprehensive Development Code Update, to be completed by April 2024. The City currently defers to state law regarding ADUs and JADUs until the local ordinance is updated to be consistent with state ADU law. Starting in November 2024, evaluate the consistency of Stockton's ADU regulations with State law and update accordingly. Continue to make ADU materials available; evaluate effectiveness of ADU approvals every other year, starting April 2025; and, identify additional site capacity, if needed, by December 2026. Apply annually, or as grants are available, for funding to support ADU incentives.

Program 7. Infill Strategy: The City shall continue to implement the Downtown Infrastructure Infill Incentive Program or explore other financing strategies to facilitate the development of infill projects in the Downtown and Greater Downtown areas. The Downtown Infrastructure Infill Incentive Program provides financial incentives to eligible parties in developing new market-rate residential, commercial, or mixed-use projects in Downtown Stockton. Under the Downtown Infill Infrastructure Program, eligible development projects may receive a reimbursement for certain public infrastructure improvements based on the project meeting certain criteria including a threshold number of residential units or square footage, being within the qualifying geographic area, investing at least $500,000, and needing public infrastructure improvements of at least $100,000. The program identifies actions and incentives to promote infill development, including brownfield remediation.

In addition, the Housing Action Plan, currently underway, will identify additional recommended strategies that could include:

- Identification of potential infill properties, both vacant and underutilized.
- Explore the practicality and feasibility of pre-approved design review and/or construction plans.

- Increase waivers for development standards that would restrict buildout of a small infill lot. This could include reduced setbacks, height and size increases, and an increase in the amount of waiver by the Community Development Director.
- Density increase allowances for infill projects to exceed the maximum density requirement through the existing 100-percent Density Bonus.
- Additional strategies and incentives to plan and fund infrastructure improvements.
- Ways to further streamline the ministerial design review permitting process for infill development.

Quantified Objectives: 100 extremely low-income units and 150 other lower income units; funding for 10 brownfield sites minimum to promote new housing choices and affordability in areas of opportunity.

Potential Funding: General Fund

Who Is Responsible: Economic Development Department, Community Development Department

Time Frame: Continue to offer the Downtown Infrastructure Infill Incentive Program. Adopt Housing Action Plan by April 2024. Implement Housing Action Plan strategies by 2025. Annually, beginning in 2026, identify any additional strategies needed to address overpayment and reduce displacement risk and implement them within 2 years of identification.

Program 8. Site Assembly: The City shall actively work with local property owners and developers to assist in the consolidation and assembly of small privately-owned parcels (including infill parcels) for residential projects, particularly as related to parcels listed in the sites inventory and parcels with multiple owners. The City is updating infill requirements as part of the Comprehensive Development Code Update. The City is also working on mapping potential infill sites that are vacant and ready for development as part of the Housing Action Plan, currently underway (see Programs 5 and 17). The City shall continue to process lot mergers ministerially and shall offer incentives, in addition to the incentives already offered to infill development. The City shall also conduct meetings to connect owners of properties with potential developers and to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. As developers/owners approach the City with interest in lot consolidation for the development of affordable housing, the City could defer certain fees, allow more height or additional stories, waive lot merger fees for certain small contiguous lots, and provide concurrent/fast tracking of project application reviews to developers who provide affordable housing. By 2027, the City will review the effectiveness of this program and revise as appropriate. The City will also evaluate grant funding for parcel assemblage land banking when it is available.

Quantified Objectives: Support at least 5 lot consolidations on sites with lower income units during the planning period. Facilitate lot consolidation to produce sites for 2,300 moderate and above moderate residential units to produce new housing opportunities throughout city.

Potential Funding: General Fund

Who Is Responsible: Economic Development Department

Time Frame: Establish program or resources to connect property owners and developers by December 2025, and assess incentives and resources annually thereafter. Based on the meetings with developers and property owners, add and evaluate incentives as appropriate. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.

Program 9. Government-Owned Sites: As specified in **Chapter 4** and **Appendix A,** the Housing Element is relying on a cluster of vacant parcels totaling 3.7 acres that are owned by the Stockton Unified School District (SUSD) to satisfy a portion of its RHNA allocation, including 32 lower-income units and 182 above moderate-income units. The City is committed to continuing to coordinate with SDSU on development plans for these parcels. Additionally, the Housing Element is relying on 14 parcels owned by the City, totaling 15.54 acres to satisfy a portion of its RHNA allocation, including 68 lower-income units and 412 above moderate-income units. If a plan for housing development on these parcels is not underway by 2026, with building permits issued by June 2029 the City will identify additional sites for housing accordingly, including rezoning sites to address the RHNA if needed.

The City will utilize City-owned sites to develop mixed-income housing projects. All sites are presently suitably zoned and vacant. The City will make such parcels available to developers building affordable housing or otherwise ensure the development of housing on such sites. The anticipated timelines for development are listed in the Timeframe section below and described more fully in Chapter 4. The process to make City-owned sites available will include outreach to create partnerships with affordable housing developers that can maximize the opportunities and number of units. This will include facilitation of lot consolidation, if needed (as described in Program 8) on any city sites in the list below that could benefit from lot consolidation to create a project. The City will facilitate development by providing incentives, as described in Program 7, as appropriate. As described in Chapter 4, the City will continue to use the Surplus Lands Act (SLA) process to pursue affordable housing projects in the city. The City will require an affordability covenant recorded against the land stipulating a specified percent of the total units developed will be affordable to lower-income households, in accordance with State law. The City will comply with State law to implement the SLA process as follows:

- The City will declare land "surplus" in accordance with the definition listed in Government Code, Section 54221, subdivision (b)(1).
- The City will prepare and issue a Notice of Availability (NOA) to the required parties and provide 60 days to receive responses from interested parties.
- The City will negotiate in good faith with any respondents for at least 90 days, prioritizing affordable housing uses in the order provided in Government Code section 54227.
- The City will send the proposed disposition to the State for review.
- The City will address any State findings, as needed.
- Upon final State approval, the City will execute a sale or lease of the land and record an affordability covenant.

Quantified Objectives: Facilitate development of government-owned sites for 100 lower-income units and 594 above moderate-income units to produce new housing opportunities throughout city.

Potential Funding: General Fund

Who Is Responsible: Economic Development Department

Time Frame:

- SDSU-Owned Sites 1-1 through 1-17 and 1-39 through 1-42: The City will coordinate with SDSU quarterly, starting immediately, with the goal of development of the sites by 2028.
- City-Owned Sites 4-96, 4-97, 4-230, 4-33, 4-231, 4-232, 3-74, 4-183:
  - RFI/SOQ Issued: Q4 2023
  - Entitlements: June 2025
  - Building Permits: December 2025
  - Construction Complete: June 2027
- City-Owned Sites 1-18, 1-19, 1-20, 1-21:
  - RFP previously released in 2020
  - Entitlements: October 2024
  - Building Permits: May 2025
  - Construction Complete: July 2027
- City-Owned Sites 4-67, 4-210:
  - RFI/SOQ Issued: Anticipated Q2 2025
  - Entitlements: June 2026
  - Building Permits: December 2026
  - Construction Complete: June 2028

If a plan for housing development on these parcels is not underway by 2026, with building permits issued by June 2029 the City will identify additional sites for housing accordingly, including rezoning sites to address the RHNA if needed.

Program 10. Large Site Development: As specified in **Chapter 4** and **Appendix A,** the Housing Element is relying on 4 large vacant sites (9-12, 12-34, 12-35, 12-36), totaling 106.23 acres, to satisfy a portion of its RHNA allocation, including 1,512 lower-income units. The City shall actively work with local property owners and developers to assist in the development of these sites. The City will promote, incentivize, and support lot splits and/or large lot development by offering expedited processing. The City will proactively conduct outreach efforts on an annual basis until large higher-density sites in the inventory have been developed in order to distribute information to potential developers and provide notice of incentives to further encourage development of larger parcels. Outreach efforts may include, but will not be limited to, one-on-one meetings with developers and property owners, as well as maintaining and advertising an inventory of large sites appropriate for residential development and informational materials on available incentives. City staff will continue to work with affordable housing builders that have built projects within the City and keep them apprised of available properties for development.

The City will offer the following incentives for the development of affordable housing on large sites, which may include, but is not limited to:

- Streamlining and expediting the approval process for land division
- Ministerial review of lot line adjustments
- Deferral of fees related to the subdivision
- Providing technical assistance to acquire funding

In addition, the City will track development approvals on large sites in the inventory. If projects approved on this type of site by December 31, 2027 are not in line with the City's RHNA projections on larges sites in the inventory, within one year (by December 31, 2028) the City will identify additional sites to address the remaining RHNA and if necessary will rezone to make the sites available for residential development.

Quantified Objectives: Facilitate large lot development, including lot splits, as needed to produce sites for 1,512 lower-income units to produce new housing opportunities throughout city.

- Conduct one-on-one meetings with developers and property owners.
- Proactively conduct outreach advertising available incentives, resources, and relevant information for the development of larger sites.
- Establish, maintain, and promote an inventory of large sites appropriate for residential development.
- Facilitate and streamline parceling, or other similar planning methods, to encourage the development of large sites with affordable housing components.

Potential Funding: General Fund

Who Is Responsible: Economic Development Department

Time Frame: Ongoing, as projects come forward. Establish program to connect property owners and developers by December 2025. Annually reach out to developers to gather input on available incentives. Annually conduct outreach and advertising. Facilitate and streamline parceling, or other similar actions, for large sites through 2031. Assess project approvals on large Housing Element inventory sites as of December 31, 2027. If approved projects are not in line with the City's RHNA projections on large sites in the inventory, within one year (by December 31, 2028) the City will identify additional sites beyond the large sites in the inventory in order to further facilitate residential development and if necessary will rezone to make the sites available for residential development.

GOAL HE-2 AND ASSOCIATED POLICIES

GOAL HE-2: PROVIDE HIGH QUALITY HOUSING FOR ALL INCOME GROUPS. ENCOURAGE AND PROMOTE THE CONSTRUCTION OF AFFORDABLE AND MARKET RATE HOUSING TO MEET CITY'S HOUSING NEEDS AND PROMOTE DEVELOPMENTS THAT CONSERVE ENERGY.

Policy HE-2.1 Pursue Funding: The City shall pursue Federal and State housing assistance programs designed to help meet the needs of extremely low-, very low-, low-, and moderate-income households. (Program 12)

Policy HE-2.2 Networking and Collaboration: The City shall continue to collaborate with public agencies and private and nonprofit entities to access State, Federal, and other sources of funding to provide housing to lower- and moderate-income households. (Program 11)

Policy HE-2.3 Affordable Housing Incentives: The City shall explore incentives, bonuses, and flexibility in standards and requirements in the Development Code that could benefit affordable housing development, such as density bonuses, flexible development standards, and deferred payment of fees. (Programs 5, 13 and 20)

Policy HE-2.4 Homeownership Opportunities: The City shall continue to provide opportunities for and reduce barriers to homeownership and promote financial literacy and public awareness of the various means available to become a homeowner. (Program 12)

Policy HE-2.5 Priority Sewer and Water Service for Affordable Housing: The City shall provide priority sewer and water service for developments that include lower income housing units, consistent with State law (Government Code Section 65589.7). (Program 13)

Policy HE-2.6 Energy Conservation and Waste Reduction: The City shall promote energy conservation and waste reduction in residential site planning, design, and construction. (Program 14)

Policy HE-2.7 Energy Conservation and Efficiency in City Regulations: The City shall use its review and regulatory power to enhance and expand residential energy conservation and efficiency. (Programs 14, 15, and 16)

Policy HE-2.8 Green Building Concepts: The City shall require green building concepts and processes in new residential construction and rehabilitation of existing housing consistent with State building standards and local subdivision and zoning standards. (Program 14)

Policy HE-2.9 Energy Conservation and Efficiency Programs: The City shall work with local energy providers to promote weatherization and energy conservation programs and incentives to new and existing residential developments, especially low-income households. (Programs 14, 15, and 16)

Policy HE-2.10 Green-Up Stockton: The City shall encourage voluntary residential energy efficiency assessments and retrofits for existing dwelling units. (Program 15)

GOAL HE-2 IMPLEMENTATION PROGRAMS

Program 11. Coordination with the Housing Authority of San Joaquin County: The City shall continue to work closely with the Housing Authority of San Joaquin County in providing assisted housing through the Housing Voucher Program, and in providing housing and supportive services to special needs households and individuals, including farmworkers. In addition, working with the Housing Authority, implement a Housing Choice Voucher education program to share information about the program and available incentives with rental property owners and managers as well as training on avoiding discriminatory practices based on income or other protected classes. Distribute this information at least annually to property owners and managers across the City, though with an emphasis on higher (moderate, high, and highest) resource areas where there are no public housing opportunities available, a disproportionately low rate of voucher usage, and high performing schools. Additional outreach will be targeted in areas with the highest concentration of children in single female-headed households, including parts of the Weston/Van Buskirk neighborhood, Downtown, and South Stockton.

Quantified Objectives: Provide vouchers to 3,800 households in Stockton and assist these lower income households in accessing rental opportunities with Housing Choice Vouchers to facilitate housing mobility. Target additional outreach in areas with the highest concentration of children in single female-headed households, including parts of the Weston/Van Buskirk neighborhood, Downtown, and South Stockton.

Potential Funding: General Fund

Who Is Responsible: Economic Development Department, Housing Authority of San Joaquin County

Time Frame: Ongoing; establish education program by the end of 2024 and distribute information. Then distribute information at least annually through the end of the planning period.

Program 12. State and Federal Funding: The City shall continue to apply annually for Federal entitlement funds under the CDBG, HOME and ESG Programs, and shall pursue additional State and Federal funding that becomes available during the planning period. The City shall continue to administer its Down Payment Assistance Program for low-income first-time homebuyers using a variety of funding sources, including CDBG and HOME funds. The program will be targeted to those buying in higher opportunity areas and farmworkers. The City shall support housing organizations and affordable housing developers by assisting in applications for funding, drafting letters of support and resolutions, and identifying potential sites for affordable housing. The City shall also discuss the possibility of requiring affordable units as part of development agreements when initiating discussions with applicants.

Quantified Objectives: Fund 200 extremely low-, 400 very low-, 450 low-income units; Provide down payment assistance to 75 low-income households, particularly in high opportunity areas such as the Morada/Holman, Brookside/Country Club, Eight Mile/Bear Creek, and Midtown neighborhoods. Outreach for the program will target the areas above as well as areas in relative proximity to agricultural employment including parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, and the North Stockton Annex neighborhood to provide residential opportunities for farmworkers near areas of agricultural employment.

Potential Funding: General Fund; CDBG, HOME, HELP, and CalHome

Who Is Responsible: Economic Development Department

Time Frame: Review funding opportunities annually; down payment assistance program is ongoing

Program 13. Priority Sewer and Water Service for Affordable Housing: The City shall include language in the development code to provide priority sewer and water service for developments that include lower income housing units, consistent with State law (Government Code Section 65589.7).

Quantified Objectives: Include in Development Code as part of Comprehensive Update

Potential Funding: General Fund

Who Is Responsible: City Council, Municipal Utilities Department, Community Development Department

Time Frame: Include in Development Code as part of Comprehensive Update by April 2024

Program 14. Property Assessed Clean Energy (PACE) Program. The City shall continue to provide programs for property owners to finance the purchase and installation of infrastructure improvements to their properties with no up-front costs for: renewable energy, energy- and water-efficiency improvements, water conservation upgrades, and/or electric vehicle charging to increase place-based strategies.

Quantified Objectives: Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs, with a target of 50 percent in the areas listed under program outreach in the next sentence, to increase place-based strategies. Program outreach will be prioritized in areas with high rates of homeowner overpayment, including the Mariposa Lakes neighborhood, parts of Downtown and East Stockton, the Industrial Annex area, and parts of the Pacific Avenue/Lincoln Village and Weston/Van Buskirk neighborhoods.

Potential Funding: Property Assessed Clean Energy (PACE) financing

Who Is Responsible: Economic Development Department

Time Frame: Ongoing. A unique, centralized location for this program on the City's website will be created by December 2025. Annual updating will occur thereafter.

Program 15. Green-Up Stockton: The City shall continue to encourage voluntary energy assessments for housing units built prior to November 1, 2002. The City shall continue to work with community services agencies and PG&E and other funding sources to identify funding and incentivize residential energy efficiency projects to increase place-based strategies.

Quantified Objectives: Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs, with a target of 50 percent in the areas listed under program outreach in the next sentence, to increase place-based strategies. Program outreach will be prioritized in areas with high rates of homeowner or renter overpayment, including the South and East Stockton, Midtown, Industrial Annex, Downtown, and Mariposa Lakes neighborhoods.

Potential Funding: General *Fund*

Who Is Responsible: Community Development Department

Time Frame: Ongoing

Program 16. Weatherization Activities: The City shall advertise local weatherization programs by posting information on the City website and distributing fliers and brochures, and shall refer elderly homeowners, low-income households within certain income limits, and the general public to agencies offering weatherization programs. The City will also pursue funding opportunities as available to provide small loans or grants to extremely low income households looking to complete weatherization projects to reduce displacement risk caused by substandard housing conditions or high energy costs. Additionally, the City will target outreach in high and moderate resource areas in relative proximity to agricultural employment opportunities to ensure housing where farmworkers reside is sufficiently maintained, including parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, the Morada/Holman neighborhood, and the North Stockton Annex neighborhood. Additional outreach will be targeted in areas with the highest concentration of children in single female-headed households, including parts of the Weston/Van Buskirk neighborhood, Downtown, and South Stockton to increase place-based strategies.

Quantified Objectives: 200 units weatherized, with a target of 50 percent in the areas listed under additional program outreach below to increase place-based strategies. Program outreach will be prioritized in lower-income neighborhoods and areas with high rates of homeowner or renter overpayment, including the South and East Stockton, Midtown, Industrial Annex, Downtown, and Mariposa Lakes neighborhoods. Additionally, outreach will be prioritized in the area southeast of the intersection of Thornton Road/Pacific Avenue and West Hammer Lane, where the city may be able to reach more senior households. Additional program outreach will target areas in relative proximity to agricultural employment including parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, the Morada/Holman

neighborhood, and the North Stockton Annex neighborhood. Additional outreach will be targeted in areas with the highest concentration of children in single female-headed households, including parts of the Weston/Van Buskirk neighborhood, Downtown, and South Stockton.

Potential Funding: Home Energy *Assistance Program HEAP*

Who Is Responsible: Economic Development Department

Time Frame: Program availability is ongoing. Advertising of the program by the City on the City website and direct outreach will begin by December 2024.

GOAL HE-3 AND ASSOCIATED POLICIES

GOAL HE-3: REMOVE GOVERNMENTAL CONSTRAINTS. ADDRESS AND, WHERE FEASIBLE, REMOVE UNNECESSARY GOVERNMENTAL CONSTRAINTS TO THE DEVELOPMENT, IMPROVEMENT, AND MAINTENANCE OF STOCKTON'S HOUSING STOCK, AND ENCOURAGE HIGHER-DENSITY DEVELOPMENT.

Policy HE-3.1 Mitigate Governmental Constraints: The City shall strive to mitigate local governmental constraints to the development, improvement, and maintenance of housing. (Programs 17, 18, and 19)

Policy HE-3.2 Streamlined Permitting: The City shall continue to streamline the local permit review and approval processes for affordable and infill housing projects. (Programs 17, 18 and 19)

Policy HE-3.3 Application and Development Fees: The City shall strive to ensure that application and development fees do not unnecessarily constrain production of new infill and multifamily housing. (Program 18)

Policy HE-3.4 Defer Fees for Affordable Housing: The City shall continue waiving and deferring eligible fees to help offset development costs for affordable housing. (Program 18)

Policy HE-3.5 Creativity and Flexibility: The City shall allow for flexibility in the application of development standards to encourage creative and innovative housing solutions. (Program 20)

GOAL HE-3 IMPLEMENTATION PROGRAMS

Program 17. Development Code Revisions: As part of the Comprehensive Development Code Update, the City shall complete the following changes to the Development Code:

- Amend the Development Code to allow care homes for six persons or fewer in the RE zone to fully comply with State law, which requires group homes for six or fewer to be treated as a single family home.
- Amend the Development Code to allow care homes for more than six persons to be subject to the same restrictions that apply to other residential uses of the same type in the same zone, to comply with State law.
- Continue to permit all types of housing (single family, multi-unit, and multifamily) uses "by-right" and expand "by-right" land uses for businesses and services that support housing.
- Update Use Permit findings (used for review of residential uses) to be objective.
- Update Design Review Standards to increase their objectivity and review process to include objective design review standards and promote certainty during (ARC's) review.

- Amend the Development Code to allow employee housing for six persons or fewer in the same way residential structures are allowed in all zones allowing residential uses.
- Amend the Development Code to allow emergency shelters without discretionary review (by right – without conditional or other discretionary permit) in additional zoning districts that allow residential uses, is in proximity to transportation and services, with appropriate development standards, and contains sufficient capacity per capacity analysis required by state law, to address the 893-person unsheltered need in the City. This use will be allowed without discretionary review in one or more of the following zoning districts:
  - Residential High-Density
  - Commercial Office
  - Commercial General
  - Commercial Downtown
- Amend the Development Code to update the definition of emergency shelter to comply with current state law to expand the definition of emergency shelter to include interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care.
- Amend the Development Code to update standards for emergency shelters, including parking, minimum distance, and any other updates needed for consistency with State law.
- Include a State-compliant definition of "family" in the Development Code.
- Evaluate the possibility of implementing SB 10 (Planning and Zoning Law) in appropriate areas of the city. SB 10 is an option for jurisdictions to allow for streamlined review of certain housing projects up to 10 units in transit-rich areas or urban infill sites to increase housing opportunity and reduce VMT.
- Per the agreements with the Department of Justice and Sierra Club, the City shall create new industrial design and operational standards that will regulate new industrial uses and buildings adjacent to residential communities.
- Amend Development Standards as follows:
  - RH zone from 35 feet to 45 feet (ministerial)

Development Code Amendments to Facilitate Opportunities for Residential Development in Zoning Districts that allow Non-Residential Development

- Expand Development Code to allow residential projects in all residential and commercial zoning designations.
- State explicitly in the Development Code that 100 percent residential projects are allowed in all commercially zoned districts as is currently allowed in practice in CN, CG and CD.
- Amend the Development Code to address missing middle sized housing types by allowing Multi-Unit Residential (up to 4 units) without discretionary review in all Residential and Commercial zones.
- Amend Development Standards as follows:
  - Increase maximum heights as follows:
    - CO zone from 45 feet to 60 feet with a CUP (max height w/out CUP unchanged – 45 feet)
    - CN zone from 35 feet to 45 feet (ministerial)
    - CG zone from 45 feet to 75 feet (ministerial)
  - Decrease interior side setback in the CO zone from 5 feet to 0 feet
  - Increase interior side setback in the CO zone, when adjacent to residential, from 5 to 10 feet
  - Decrease minimum open space per multifamily dwelling unit, from 100 square feet to
    - 50 square feet in the Downtown Core Area and
    - 75 square feet in the Greater Downtown Area
- Amend the Development Code and possibly General Plan to encourage future transitions in disadvantaged communities via new commercial/industrial zones that would remove heavy industrial uses from many of the South Stockton areas.

Quantified Objectives: N/A

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Amend Development Code to allow emergency shelters without discretionary review in additional zoning districts within one year of Housing Element adoption. All other amendments in this program will be completed by April 2024.

Program 18. Fiscally Positive Impact Fees: The City's adopted impact fees on new development or other ongoing funding mechanisms (e.g., community facilities districts) are fiscally positive to the City. The City shall continue to consider the impacts on the cost, supply, and affordability of housing and ensure that fees do not unduly constrain housing development by continuing to monitor the Residential Development Public Facilities Fees (PFFs) Exemption Program, Citywide Affordable Housing Development Public Facilities Fees Exemption Program, Greater Downtown Stockton Residential Development Public Facilities Fees Exemption Program, and Stockton Economic Stimulus Plan (SESP) fee reduction components to ensure they are addressing potential constraints. To encourage the development of housing affordable to extremely low-income households, the City will evaluate the feasibility of providing impact or other development fee waivers or deferrals for projects with extremely low-income units.

Quantified Objectives: Provide exemptions and reductions to 200 housing units to reduce overpayment for housing costs and reduce displacement risk specifically for lower-income communities, including 30 units affordable to extremely low-income households.

Potential Funding: General Fund

Who Is Responsible: Community Development Department, Public Works Department

Time Frame: Annually, evaluate exemptions provided and determine whether all constraints to housing development associated with impact fees or other funding mechanisms are sufficiently addressed. If it is found that they are not being addressed, modifications will be made to one or more exemption programs within one year. This will occur after each annual review until the end of the planning period. The City will evaluate the feasibility of providing impact or other development fee waivers or deferrals for projects with extremely low-income units by the end of 2025.

Program 19. Streamline Approvals and Support for Affordable Housing Projects: The City will develop a preliminary application form and procedure or will formally adopt the Preliminary Application Form developed by the California Department of Housing and Community Development (HCD), pursuant to SB 330. The City will also establish a written policy and/or procedure, and other guidance as appropriate, to specify the SB 35 streamlining approval process and standards for eligible projects under Government Code Section 65913.4. The applications will be available on the City's website for developers interested in pursuing the streamlined process or vesting rights. In addition, to facilitate housing mobility and approve more lower income units in higher resourced areas of the city, the City will implement a minimum of two of the items below:

- Community benefit options that could be included in the criteria for initiating modified and new Development Agreements. These benefits could include Inclusionary Housing requirements and fees, Community Benefit agreements, increased land dedications for future city services, and joint-lease agreements for schools and civic uses.
- Other community benefits the City will explore to prevent displacement include a right to counsel program, tenant bill of rights, housing trust fund, rent escrow account program, and land banking. If additional community benefits are approved, put into place by December 2024.
- Additional funding for pre-construction analysis and remediation of infill sites for affordable housing projects and/or infill sites in low-resource areas.
- Additional funding for infrastructure deficiency analysis and improvements in low-income and low resource areas.

- Update the Citywide Public Facilities Fees (i.e., Impact Fees), and determine the current cost for providing services to underserved areas, adjust fees accordingly and provide waivers for affordable housing projects.
- Outreach to establish working community groups within low-resource areas to determine needs and establish community partners for future housing projects.

Quantified Objectives: 150 new affordable units permitted through SB 35 approval streamlining and development of 150 affordable units facilitated by using the adopted preliminary application form.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Develop or adopt HCD's SB 330 preliminary application form and develop an SB 35 streamlined approval process by December 2024 and implement as applications are received. The City will implement a minimum of two of the options listed in Program 19, to further streamline approvals and support affordable housing projects by December 2026. **Program 20. Density Bonuses:** The City will continue to allow density bonuses that exceed State requirements and periodically amend its Development Code to comply with changes in California's density bonus law (Government Code Section 65915 et seq., as revised) and will promote the use of density bonuses for lower-income units by providing information through a brochure in City buildings and on the City's website. In addition, as part of the Development Code process the City is currently exploring the creation of a new staff level process that would allow projects for all income levels to exceed density maximums (General Plan prescribed and 100-percent bonuses).

Quantified Objectives: Facilitate the construction of 1,000 lower-income units to increase mobility opportunities; encourage density bonus units in high-resource areas.

Potential Funding: General Fund and grant funding

Who Is Responsible: Community Development Department

Time Frame: Complete as part of Comprehensive Development Code Update by April 2024; annually review Development Code and revise as needed; produce brochures and make information available on the City's website by December 2024.

GOAL HE-4 AND ASSOCIATED POLICIES

GOAL HE-4: PRESERVE EXISTING HOUSING. CONSERVE AND ENHANCE EXISTING HOUSING IN STOCKTON'S NEIGHBORHOODS.

Policy HE-4.1 Preserve Existing Affordable Housing: The City shall seek to preserve existing affordable rental housing, such as subsidized apartments for lower-income households, mobile homes in mobile home parks, and low-cost private rental housing. (Program 21 and 24)

Policy HE-4.2 Housing Maintenance and Rehabilitation: The City shall encourage maintenance, repair, and rehabilitation of existing owner-occupied, rental, and affordable housing to prevent deterioration of housing and ensure that housing is safe and sanitary. (Program 22)

Policy HE-4.3 Housing Unit Replacement: The City shall promote the removal and replacement of dilapidated housing units in compliance with State law regarding replacement of existing affordable housing. (Program 23 and 24)

Policy HE-4.4 Property Management: The City shall encourage good property management practices in rental properties through regulatory agreements, informational items, code enforcement staffing, the Crime Free Multi-family Housing program, and the City's rental inspection ordinance. (Program 23)

GOAL HE-4 IMPLEMENTATION PROGRAMS

Program 21. Preserve At-Risk Units: Pursuant to Assembly Bill (AB) 1521, the City will monitor the list of all dwellings in Stockton that are subsidized by government funding or low-income housing developed through local regulations or incentives. The list will include, at a minimum, the number of units, the type of government program, and the date on which the units are at risk to convert to market-rate dwellings. There have been 392 units (see Analysis of At-Risk Housing section in the Regional Housing Needs Assessment) identified as at risk of converting to market rate within ten (10) years of the beginning of the 6th Cycle Housing Element planning period. The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/ occupancy; and the date on which the units are at risk to convert to market rate. The City will work to reduce the potential conversion of any units to market rate, in order to reduce the potential for displacement and/or placement of additional constraints on the existing affordable housing stock through the following actions:

- Monitor the status of affordable projects, rental projects, and manufactured homes in Stockton. Should the property owner(s) indicate a desire to convert properties, and providing technical and financial assistance when possible, to incentivize long-term affordability.
- Provide information on at-risk housing as well as other housing options and programs for residents and housing advocates on the City's website.
- If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher program. Funding sources may include state or local funding sources to reduce potential for displacement of residents.

Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within three (3) years, 12 months, and six (6) months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements, that were part of a project granted a density bonus, or that were part of a project that received other incentives.

If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing administration / management.

When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market values is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing in the City. The City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the 55-year restriction shall be "rolled over" for another 55 years to protect "at-risk" units.

Quantified Objectives: Continue to monitor the 392 assisted units, and if any become at risk, work with property owners to develop a strategy to provide assistance to maintain or replace 392 at-risk units as affordable to reduce potential for displacement of tenants and loss of affordable housing stock in the city.

Potential Funding: HOME, CDBG, CalHOME

Who Is Responsible: Economic Development Department

Time Frame: Ongoing communication with owners, service providers, and eligible potential purchasers; work with owners of deed-restricted units on an ongoing basis, in particular at the time of change of ownership.

Program 22. Housing Rehabilitation Programs: The City shall continue to administer its owner-occupied loan program and emergency repair program using a variety of funding sources, including CDBG and HOME funds. The City will improve communication regarding rehabilitation assistance programs currently available for lower-income households, including to eligible owners of mobile homes, and rental property owners to alleviate substandard conditions to increase place-based strategies. The City recently conducted a blight study that included a windshield survey of the former redevelopment areas and opportunity zones to identify parcels/properties with physical signs of deterioration, vacant properties, and potential environmentally contaminated sites. The results of the study and survey will inform a place-based strategy for prioritizing rehabilitation during the planning period. In addition, the HAP and Neighborhood Action Plans will outline underutilized and vacant parcels as well as complete a housing condition survey to indicate units in need of repair. The City will also pursue funding opportunities as available to provide small loans or grants to extremely low income households looking to complete home rehabilitation projects to reduce displacement risk caused by substandard housing conditions. Additionally, the City will target outreach in high and moderate resource areas in relative proximity to agricultural employment opportunities to ensure housing where farmworkers reside is sufficiently maintained, including parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, the Morada/Holman neighborhood, and the North Stockton Annex neighborhood. Additional outreach will be targeted in areas with the highest concentration of children in single female-headed households, including parts of the Weston/Van Buskirk neighborhood, Downtown, and South Stockton.

Quantified Objectives: Assist 300 lower-income units to address potential displacement, with a target of at least 50 percent in areas of the city with the poorest housing conditions as identified during the windshield survey to increase place-based strategies, including the Downtown area; areas in close proximity to agricultural employment opportunities such as parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, the Morada/Holman neighborhood, and the North Stockton Annex neighborhood; as well as any areas identified during the development of the HAP and Neighborhood Action Plans. Additional outreach will be targeted in areas with the highest concentration of children in single female-headed households, including parts of the Weston/Van Buskirk neighborhood, Downtown, and South Stockton. Of these units, assist 75 units with extremely low-income households.

Potential Funding: HOME, CDBG, CalHOME

Who Is Responsible: Economic Development Department

Time Frame: Complete study and survey in 2023. Rehabilitation program is ongoing. Annually review the availability of funding opportunities and apply as opportunities become available.

Program 23. Code Enforcement Program: The City shall continue to inspect housing units in targeted areas to check for building code violations to increase place-based strategies. In situations where properties cannot be rehabilitated, the City will continue to enforce the removal and replacement of substandard units. The City will utilize a place-based strategy for prioritizing areas for inspection based on the results of its recent blight study, which highlighted the need for addressing blight conditions in the Downtown area. Additionally, the City will target inspection in high and moderate resource areas in relative proximity to agricultural employment opportunities to ensure housing where farmworkers reside is sufficiently maintained, including parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, the Morada/Holman neighborhood, and the North Stockton Annex neighborhood.

Quantified Objectives: Inspect 2,000 units annually, with a target of prioritizing at least 50 percent in the areas with high potential need for rehabilitation, including the Downtown area; as well as areas in close proximity to agricultural employment opportunities including parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, the Morada/Holman neighborhood, and the North Stockton Annex neighborhood; as well as any areas identified during the development of the HAP and Neighborhood Action Plans.

Potential Funding: CDBG

Who Is Responsible: Police Department: Neighborhood Services Division

Time Frame: Ongoing

Program 24. Replacement of Existing Affordable Units: In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915I(3) on sites identified in the sites inventory when any new development that removes existing residential units (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. This requirement applies to:

- Nonvacant sites
- Vacant sites with previous residential uses that have been vacated or demolished.

Quantified Objectives: N/A

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Ongoing

GOAL HE-5 AND ASSOCIATED POLICIES

GOAL HE-5: PROVIDE EQUITABLE HOUSING AND SUPPORTIVE SERVICES. PROVIDE A RANGE OF HOUSING OPPORTUNITIES AND SERVICES FOR HOUSEHOLDS WITH SPECIAL NEEDS, PROMOTE HOUSING OPPORTUNITIES FOR ALL RESIDENTS, AND SUPPORT THE ELIMINATION OF DISCRIMINATION IN HOUSING.

Policy HE-5.1 Special Needs Accommodation: The City shall seek to accommodate housing and shelter for residents with special needs through appropriate zoning standards and permit processes. (Programs 25, 26, 27, 28, and 29)

Policy HE-5.2 Homeless Needs: The City shall strive to address the shelter needs of its homeless residents, and continue to support the provision of facilities and services to meet the needs of homeless individuals and families. (Program 25)

Policy HE-5.3 Temporary Housing: The City shall support temporary housing for individuals with special needs (e.g., seniors who have experienced abuse or neglect, individuals who may be at physical or psychological risk, mentally ill homeless individuals, those with HIV/AIDS or other debilitating illnesses) in board and care homes and respite centers. (Program 25)

Policy HE-5.4 Large Households: The City shall encourage the development of single-family and multifamily housing affordable to large households. (Program 30)

Policy HE-5.5 Households with Language Barriers: The City shall make information available on housing opportunities and programs to residents who are primarily non-English speaking. (Program 30)

Policy HE-5.6 Housing for Persons with Disabilities: The City shall encourage the development of housing accessible to people with disabilities, including developmental disabilities. The City shall ensure equal access to housing by providing reasonable accommodation for individuals with disabilities. (Programs 26, 27, and 28)

Policy HE-5.7 Farmworkers: The City shall work with San Joaquin County in efforts to increase the availability of safe, sound, and affordable housing for farmworkers. (Program 28)

Policy HE-5.8 Prohibit Discrimination: The City shall support the strict observance and enforcement of anti-discrimination laws and practices including prohibiting discrimination in the sale or rental of housing with regard to race, color, national origin, ancestry, religion, disability, source of income, gender/gender identity, sexual orientation, marital status, and familial status. (Programs 30 and 32)

Policy HE-5.9 Affirmatively Further Fair Housing: The City shall affirmatively further fair housing consistent with State and Federal law through implementation of programs in this Housing Element and in all other City practices. (Program 30 and 31)

GOAL HE-5 IMPLEMENTATION PROGRAMS

Program 25. Continue to Support Organizations Assisting Homeless Persons: The City shall annually apply for and continue to pursue State and Federal funds available to the City, private donations, and volunteer assistance to support homeless shelters. The City shall continue to provide financial assistance from its Emergency Solutions Grant (ESG) funding to homeless service providers and continue to support additional development of shelter facilities as requested by shelter providers. In addition, the City shall review the need for additional shelter facilities and services when it updates its Consolidated Plan, prioritizing higher-resource areas.

In accordance with its 2022 Homeless Action Plan, the City will also do the following:

- Provide operational support through CDBG funds and the Emergency Solutions Grant to improve outreach and engagement while providing basic services to those experiencing homelessness.
- Use Homeless Housing, Assistance and Prevention Program (HHAP) funds to invest in the Coordinated Entry and HMIS data system by January 2025 to improve the outreach-to-housing timeline and reduce the rate of chronic homelessness.
- Provide $200,000 annually to housing providers to fund on-site case managers and other support services for residents of permanent supportive housing.
- Subsidize the operation of safe camping and safe parking site programs by December 2025 and on an ongoing basis as additional funds are available.
- Use Homeless Housing Assistance Program (HHAP) funding to support the development of non-profit housing. Support the development of rental assistance and rapid re-housing programs.
- Create a reserve fund by July 2026 for the delivery of permanent housing that will be available as a match grant for affordable and permanent housing grant applications. All city-funded new affordable housing development will have a homeless and risk of homelessness set-aside of 20 percent. Eligible uses will include, but not be limited to grants to subsidize master leasing programs for either rapid re-housing or permanent supportive housing; housing for youth and young adults aged 24 and younger; and housing specifically reserved for families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking. The City will also add housing for those exiting incarceration as an eligible use of funds from this program when it is implemented.

Quantified Objectives: Annually, assist up to 2,000 unduplicated homeless persons; and 1,000 households at-risk of homelessness with limited-term rental assistance or utility payments. Target outreach and distribute information about these programs in the downtown area, close to existing homeless services. As part of this, increase the number of board and care or other types of residential or transitional care facilities for vulnerable populations by 300-500 beds. Prioritize

new residential or transitional care facilities for vulnerable populations in higher-opportunity areas or areas in close proximity to services, including the Midtown, Trinity/Northwest Stockton, Pacific Avenue/Lincoln Village, Eight Mile/Bear Creek, and Morada/Holman neighborhoods.

Potential Funding: ESG, CDBG

Who Is Responsible: Economic Development Department

Time Frame: Apply for funding annually and provide funding to housing providers to fund on-site case managers and other support services annually. Provide operating support for organizations that provide basic services, outreach, and engagement annually. Provide financial support for the Coordinated Entry system annually through at least 2027.

Program 26. Continue to Assist the Disabled in Community Development Block Grant Project Areas: The City shall continue to include special provisions for housing the disabled in CDBG project areas, including mobility grants for homes (e.g., Emergency Repair Program) and accessibility features.

Quantified Objectives: Provide mobility assistance home-repair grants for 120 low-income individuals and households including those with special needs including disabilities, in Stockton, including rental units. Of these individuals or households, provide mobility assistance for home-repair grants for 15 extremely low-income individuals or households including those with special needs including disabilities.

Potential Funding: CDBG

Who Is Responsible: Economic Development Department, Public Works Department

Time Frame: Annually, contingent upon CDBG funding

Program 27. Universal Design: Update the City's standards in the Development Code to encourage universal design features in new homes and accessory dwelling units and improve access to housing for senior residents and other residents with disabilities. In addition, Program 29 includes other actions to facilitate full accessibility, which is different than universal design.

Quantified Objectives: 100 housing units with universal design features to facilitate accessibility for persons with disabilities and seniors; encouraging at least five (5) of these units to be located near transit stations and services.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Make updates as part of the Comprehensive Development Code update by April 2024

Program 28. Assist Farm Workers and other Members of the Workforce: The City shall continue to provide ongoing assistance to farm laborers by working with the San Joaquin Housing Authority, San Joaquin County, agricultural employers, farm labor housing advocates, and the development community to develop affordable, decent housing, including rental housing, for farm workers. The City will update how employee housing (including housing for agricultural workers) is allowed in the Development Code in Program 14.

Quantified Objectives: Assist other organizations in developing at least 500 units of housing for farmworkers in Stockton or in the County during the planning period, including 300 in high and moderate resource areas in relative proximity to agricultural employment opportunities, including parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, the Morada/Holman neighborhood, and the North Stockton Annex neighborhood.

Potential Funding: CDBG, HOME, CalHOME

Who Is Responsible: Economic Development Department

Time Frame: Meet twice per year to explore opportunities for farmworker housing

Program 29. Addressing the Needs of Those with Disabilities: The City shall continue to work with the Valley Mountain Regional Center to implement an outreach program that informs families in the City about housing and services available for persons with developmental disabilities. The program includes informational brochures, and information is available on the City's website. Specifically, the City will collaborate with the Regional Center on:

- Obtaining resources for rent-subsidized affordable housing (with services if necessary) for people with intellectual and/or developmental disabilities,
- Creating and preserving accessible housing; and,
- Ensuring rental-based tenant assistance meets the unique needs of people with intellectual and developmental disabilities and includes housing navigation supports for this subpopulation of people with disabilities.

For compliance with State law, the City will revise or delete the following two findings for granting a reasonable accommodation:

- Whether the requested reasonable accommodation adequately considers the physical attributes of the property and structures.
- Whether alternative reasonable accommodations could provide an equivalent level of benefit.

The City will also make the following revisions:

- Section 16.214.030 Definitions: "'Individual with a disability'" means any person who has a medical condition, physical disability, or mental disability that substantially limits one (1) or more of the person's major life activities, as those terms are defined in the Acts." The City's definition here aligns with the federal, but not the state definition of disability. To comply with Government Code § Gov. Code §12926.1(c), the City will strike the word "substantially". The City shall also include a complete definition of disability: The Act protects any of the following: an individual with a physical or mental impairment that limits one or more major life activities; anyone who is regarded as having any such impairment; or anyone who has a record of having such an impairment. Individuals in recovery from drug or alcohol abuse are protected by federal and state fair housing laws. However, individuals currently using illegal substances are not protected under the law, unless they have a separate disability.
- The Development Code shall be updated to be clear that protections afforded people with disabilities under federal and state fair housing laws extend to those who are associated with them, including providers and developers of housing for people with disabilities.
- Section 16.214.060 Application Filing: A provision will be made to ensure confidentiality of the person with a disability's contact and medical information. Further, this section will make clear that not only may a person with a disability file an application, but also an organization serving people with disabilities (e.g. sober living homes, transitional or supportive housing for people with disabilities, etc.)
- Section 16.214.070 Review and Processing: The City will remove the requirement to notify neighbors of a reasonable accommodation request, to ensure meaningful access to the City's land use and zoning programs under the ADA and to affirmatively further fair housing under AB 686 and the Fair Housing Act.
- Section 16.214.080 Findings and Decision: The City will add a clause making it clear that if the request is denied because it would impose an undue financial and administrative burden on the County and/or would require a fundamental alteration to the zoning or building laws, policies or procedures of the County, the Director or their designee must engage in an interactive process with the person seeking the accommodation to determine if there is another reasonable accommodation that may provide an equivalent level of benefit.
- Section 16.214.090 Appeals: Revise to state that appeals will be directed to the City Manager in consultation with the ADA Coordinator, in order to ensure confidentiality.

The City shall also prepare public information brochures and website information on reasonable accommodations for disabled persons and translate the materials to provide information to residents with language barriers. The City shall make this information available at the public counter and distribute the materials to community groups and organizations that represent persons with disabilities.

Quantified Objectives: By revising its Development Code to remove development constraints, the City will facilitate the development of 300 units for households with a household member who has a disability.

Potential Funding: General Fund

Who Is Responsible: Economic Development Department

Time Frame: Revise the Reasonable Accommodation procedure including the findings as part of the Comprehensive Development Code Update by April 2024. Prepare public information on Reasonable Accommodations by June 2024. Continue to partner with the Valley Mountain Regional Center and review the materials on the City website annually starting in 2024 and update as needed after each annual review.

Program 30. Practices to Affirmatively Further Fair Housing: In compliance with California Government Code Sections 8899.50, 65583(c)(5), 65583(c)(10), and 65583.2(a) (AB 686), develop a plan to "affirmatively further fair housing" (AFFH). The AFFH plan shall take actions to address significant disparities in housing access and needs for all persons regardless of race, color, religion, sex, gender/gender identity, sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability and any other characteristic protected by the California Fair Employment and Housing Act (Part 2.8, commencing with Section 12900, of Division 3 of Title 2), Government Code Section 65008, and any other state and federal fair housing and planning law.

Specific actions include:

- Implement the following strategies to affirmatively further fair housing in coordination with the efforts of this action:
  - Strategies to facilitate housing mobility/expand affordable housing in high opportunity areas: Programs 6, 12, 14, 15, 17, 26, 27
  - Strategies to reduce or prevent displacement/place-based revitalization strategies: Programs 4, 7, 9, 16, 18, 21, 22, 23, 24, 31
- The City shall continue to provide funds from its CDBG Program to San Joaquin County Fair Housing to provide fair housing counseling and education and outreach efforts to City residents. In addition to providing contact information for San Joaquin Fair Housing on the City's website (under the Housing Division), the City shall continue to make referrals to Fair Housing as issues/cases come to the City's attention. The City shall also work with Fair Housing to periodically review and update fair housing brochures that are provided to the public and posted on the City's website. The City shall distribute fair housing information at City offices, the library, community centers, and other community facilities. These actions are ongoing. Review fair housing materials every two years starting in 2024. Update materials as needed every two years following the review. The City will assist at least 200 residents annually through the complaint referral process. If fewer than 200 residents use the process, provide assistance to all that do.
- The City will educate selected staff in the Community Development, Economic Development, City Attorney, and City Manager departments on responding to complaints received regarding potential claims of housing discrimination and provide these selected personnel with a handout detailing the process for someone with a complaint and the agency that should be contacted regarding a claim: Legal Aid of Northern California. The City will also maintain a log of all complaints received. The initial training of City staff will start in 2024; with updated training occurring two (2) years thereafter to align with changes to state law.

- The City will also work with San Joaquin Fair Housing to provide additional training to housing providers to prevent discriminatory actions and behaviors. If the City does not have enough staff capacity to conduct housing audits in order to reduce displacement risk, particularly in lower opportunity areas of Stockton, the City will pursue audit or other strategies to proactively identify discrimination such as contracting with a fair housing provider or outside housing consultant to provide assistance, by March 2025, and then later reviewed annually. The steps in the process would be the City issuing a Request for Proposals for partnership with an external consultant to provide the service of conducting housing audits annually. The City would either renew the contract or seek a new fair housing provider to provide the same service on a yearly basis.
- The City shall review and update its Analysis of Impediments to Fair Housing Report every five years. The next update is scheduled to happen in 2025.
- Should the City conduct a new General Plan Update within the housing cycle, the elements will be updated to strengthen existing AFFH and equity programs as well as a new disadvantaged community inventory for city and unincorporated areas within the City's sphere of influence.
- The City shall post its Annual Housing Element Progress Reports to HCD on the City website annually in the Spring after the report is completed.
- The City will implement multilingual communication and outreach strategies for City-funded affordable housing developments as follows. To increase access to City housing programs and remove barriers to homeownership, provide translation services in the most common languages spoken locally at all public meetings by July 2024 and ensure all public materials are translated and made available.
- In order to assist with the high percentage of households living in overcrowded situations including farmworkers, the City will encourage rental developments to add additional bedrooms and will prioritize the use of HOME funds for rental projects, provided that some of the units have three or more bedrooms with a goal of approving 100 units with three or more bedrooms. Additionally, when feasible, expand the City's pre-approved ADU plans to include ADU plans with 3 bedrooms.
- when feasible, expand ADU pre-approved plans to include ADU plans with 3-bedrooms.
- Incentivize on-site child care in mixed use and multifamily development, particularly for projects in areas with higher proportions of single parent households, which can make childcare easier to access for single-female headed households and potentially lower their cost of living.
- The City shall explore best practices for Rent Stabilization and Just Cause Evictions to increase the certainty and fairness within the residential rental market in the City and work to prevent displacement, in addition to the protection granted by California Civil Code Section 1946.2. Exploration may include efforts associated with the Housing Action Plan or additional outreach efforts specific to the topic presented. Specifically, steps in this process will include market/feasibility analysis (complete by December 2024), a community workshop and presentation of findings and recommendations related to the city implementing Just Cause Eviction and Rent Stabilization regulations to the Planning Commission after the exploration/evaluation is complete (hold workshop and Planning Commission meeting by June 2025).
- The City will remove and/or repeal any known program or ordinance residing within SMC Title 16 (development Code) that does not comply with current State Housing Element Law by December 2025, and annually assess if additional amendments are needed to respond to future changes to state law. This includes the voluntary "Crime Free Multi-Housing Program" to discourage criminal activities at multifamily housing facilities.

Quantified Objectives: See individual strategies bulleted in the program language at left with specific targets.

Potential Funding: CDBG; HOME*; General Fund*

Who Is Responsible: Economic Development Department, Community Development Department

Time Frame: Refer to each strategy *in this Affirmatively Furthering Fair Housing (AFFH) program for specific time frames.*

Program 31. Environmental Health and Access to Resources: Environmental health is determined by air quality, climate change related outcomes, water quality, cancer prevalence, and more. Neighborhoods with poor environmental health conditions are often correlated to their proximity to industrial uses, major transit corridors, and other larger pollution sources. The City will facilitate environmental health-oriented, place-based revitalization of neighborhoods, particularly for housing in closer proximity to the lowest scoring areas in terms of environmental health, including the Port of Stockton along the San Joaquin River, Rough and Ready Island, downtown Stockton, and industrial areas east of the Union Pacific Railroad and south of Duck Creek to the southern boundary of the city adjacent to the Stockton Municipal Airport, which are more heavily impacted by pollution from prior industrial uses and diesel particulate matter from proximity to regional freeways and rail lines, through the following strategies:

- Update the City's Parks and Recreation Master Plan and continue to enhance existing parks, open space, and tree plantings and provide new parks and open space in these areas to improve environmental health. Facilitate safe pedestrian and bicycle access to parks or open spaces to reduce environmental health disparities across the city. Implement this objective during the CIP process.
- Work with Caltrans to reduce regional air quality impacts associated with regional transportation facilities. The City will meet with Caltrans annually, as feasible, to identify options for air quality improvements and coordinate action implementation.
- Add performance measures to the City's Development Code for inventory sites located within 1000 feet of freeways and/or existing facilities that contribute to low air quality conditions as part of the Comprehensive Development Code Update, by April 2024.
- Partner with regional transit agencies and other organizations to address transit needs of those with disabilities including non-fixed-route transportation including paratransit, dial-a-ride, reduced-fare taxis or volunteer driver programs.
- Use place-based strategies to increase active transportation facilities in Downtown and South Stockton to reduce dependence on automobiles and enhance safe connections to existing pedestrian and bicycle routes. The City will identify at least two active transportation projects in these areas of the city by June 2025. The City has completed a sidewalk survey as part of the Neighborhood Action Plans (in Little Manila/Gleason Park, Cabral Station and South Airport Way areas) to identify gaps and where repairs are needed. As part of implementation of the Neighborhood Action Plans, the city plans to pursue funding to assist property owners with repair and installation of sidewalks in the three study areas. Funding could come from local sources such as the City's General Fund or State or federal sources such as the Safe Routes to School Program.
- Meet with school district representatives by June 2025 to analyze whether housing security poses a barrier, focusing on disadvantaged areas with low education domain scores, including the Port and Mount Diablo Waterfront, Midtown, South Stockton, East Stockton, Industrial Annex, Mariposa Lakes, and Weston/Van Buskirk neighborhoods. Work with the school districts to assist in securing grant funding for teacher recruitment and retention bonuses, classroom materials, and other incentives for teachers to facilitate positive learning environments citywide.
- Require developers to provide local schools with information about initial lease-ups of new affordable housing units within the school catchment area, and ask school leadership to distribute this information to families in their school.
- Implement new commercial/industrial zoning in South Stockton (details are provided in Program 17)
- Implement new industrial zoning standards and processing for reviewing existing and future industrial projects adjacent to residential uses (details are provided in Program 16)

Quantified Objectives: See individual strategies bulleted in the program language at left with specific targets.

Potential Funding: General Fund

Who Is Responsible: Community Development Department and Public Works Department

Time Frame: Refer to each strategy in this program for specific time frames.

Program 32. Removal of Racially Restrictive Covenants: Historically, covenants that restricted the sale of property to Whites or Caucasians-only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, if there are properties owned by the City of Stockton found to have racially restrictive covenants, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property purchased will require removal of any racially restrictive housing covenant prior to recording the property in the City's name. Additionally, State law (AB 1466) gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Since July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant and establish an implementation plan to identify unlawful restrictive covenants in the records of their office. The City will develop a program to support and encourage individual property owners to remove such restrictions from their deeds and provide information about accessing the County process to do so. The City will use its social media platforms, website, and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants

Quantified Objectives: Remove all racially restrictive covenants from Stockton City-owned properties by December 2025 and assist in the removal of all known privately owned properties by the end of the 6th housing cycle. Advertise County program starting in 2025; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2025, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 20 property owners annually to support their efforts to remove restrictions from their deeds.

Potential Funding: General Fund; grants if offered through a State or County program

Who Is Responsible: Community Development Department; San Joaquin County Recorder

Time Frame: Remove all covenants on City-owned properties by December 2025; launch informational campaign between June and December 2025; encouragement of removal of covenants from private properties is ongoing.

Program 33. Disperse Sites Suitable for Lower Income Housing to Affirmatively Further Fair Housing:

In compliance with California Government Code Sections 8899.50, 65583(c)(5), 65583(c)(10), 65583.2(a) (AB 686), to develop a plan to "affirmatively further fair housing" (AFFH) and ensure that sites to address the lower income RHNA are dispersed more evenly across the city in relatively higher income and higher resource areas, Stockton will identify or rezone additional lower-income units on sites suitably zoned to accommodate lower-income housing at densities up to 30 du/ac. Specifically, these additional sites will be identified in neighborhoods such as Trinity/Northwest Stockton, Eight Mile Rd/Bear Creek, and Northeast of Morada Lane. Development standards will be amended as appropriate to facilitate achieving maximum allowable densities.

Quantified Objectives: 1,193 additional lower income units on sites in relatively higher income and higher resource areas in neighborhoods such as Trinity/Northwest Stockton, Eight Mile Rd/Bear Creek, and Northeast of Morada Lane.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Make sites available including any needed General Plan or zoning code revisions, by December 31, 2026.

IMPLEMENTATION PROGRAM TABLE

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
Goal HE-1: Increase Housing Production and Ensure Adequate Land for All Housing Types and Income Levels		
1. ***Adequate Sites Monitoring and No Net Loss***	*Continue to maintain sufficient sites to address 12,673 units*	*Update inventory annually as part of the Housing Element Annual Progress Report and assess "no net loss" as projects come forward on Housing Element sites. Assess project approvals on Housing Element inventory sites as of December 31, 2027. If approved projects are not in line with the City's non-residential RHNA projections in the inventory, within one year (by December 31, 2028) the City will identify additional sites beyond the sites in the inventory that allow non-residential uses in order to further facilitate residential development.*
2. ***Downtown Implementation***	*4,400 residential units in the Greater Downtown Area by 2040*	*Adopt Comprehensive Development Code Update and HAP by April 2024; and annually thereafter to identify any additional strategies to address General Plan goals.*
3. ***Sites Included in Previous Housing Elements***	*437 residential units on 16 repeat sites identified in Appendix A that don't already allow residential development by right.*	*Update Development Code and, if needed, Land Use Element by December 31, 2026*
4. ***Public Facilities Repair and Replacement***	*5 public facility/ infrastructure projects, prioritizing lower-income, high-poverty neighborhoods such as the South Stockton neighborhood, Downtown, and parts of the East Stockton and Pacific Avenue/Lincoln Village neighborhoods.*	*Annually*
5. ***Housing and Neighborhood Action Plans***	*Permit 1,000 residential units, prioritizing affordable housing in high-opportunity areas such as the Morada/Holman, Brookside/Country Club, Eight Mile/Bear Creek, and Midtown neighborhoods. Additional focus will be given to eliminating barriers to housing construction in lower-income areas such as the Cabral Station Area and Little Manila/Gleason Park neighborhoods.*	*Neighborhood Action Plans - December 2023; Housing Action Plan – April 2024*
6. ***Accessory Dwelling Units***	*Approve 180 ADUs over the course of the planning period, targeting areas of high opportunity, specifically the following neighborhoods - Brookside/Country Club, Weston Ranch, Eight Mile/Bear Creek, Midtown around the University of the Pacific (between I-5 and "Miracle Mile/Pacific Avenue), western Upper Hammer/Thornton Rd, and eastern Morada/Holman.*	*The City is currently updating the ADU regulations as part of the Comprehensive Development Code Update, to be completed by April 2024. Starting in November 2024, evaluate the consistency of Stockton's ADU regulations with State law and update accordingly. Continue to make ADU materials available; evaluate effectiveness of ADU approvals every other year, starting April 2025; and, identify additional site capacity, if needed, by December 2026. Apply annually, or as grants are available, for funding to support ADU incentives.*

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
7. *Infill Strategy*	*100 extremely low-income units and 150 other lower income units; funding for 10 brownfield sites minimum to promote new housing choices and affordability in areas of opportunity.*	*Continue to offer the Downtown Infrastructure Infill Incentive Program. Adopt Housing Action Plan by April 2024. Implement Housing Action Plan strategies by 2025. Annually, beginning in 2026, identify any additional strategies needed to address overpayment and reduce displacement risk and implement them within 2 years of identification.*
8. *Site Assembly*	*Support at least 5 lot consolidations on sites with lower income units during the planning period. Facilitate lot consolidation to produce sites for 2,300 moderate and above moderate residential units to produce new housing opportunities throughout city.*	*Establish program or resources to connect property owners and developers by December 2025 , and assess incentives and resources thereafter. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.*
9. *Government-Owned Sites*	*Facilitate development of government-owned sites for 100 lower-income units and 594 above moderate-income units to produce new housing opportunities throughout city.*	*Coordinate with SDSU quarterly, starting immediately, with the goal of development of the sites by 2028.* *City-Owned Sites 4-96, 4-97, 4-230, 4-33, 4-231, 4-232, 3-74, 4-183: RFI/SOQ Issued: Q4 2023, Entitlements: June 2025, Building Permits: December 2025, Construction Complete: June 2027.* *City-Owned Sites 1-18, 1-19, 1-20, 1-21: RFP previously released in 2020, Entitlements: October 2024, Building Permits: May 2025, Construction Complete: July 2027.* *City-Owned Sites 4-67, 4-210: RFI/SOQ Issued: Anticipated Q2 2025, Entitlements: June 2026, Building Permits: December 2026, Construction Complete: June 2028.* *If a plan for housing development on these parcels is not underway by 2026, with building permits issued by June 2029 the City will identify additional sites for housing accordingly, including rezoning sites to address the RHNA if needed.*
10. *Large Site Development*	*Facilitate large lot development, including lot splits, as needed to produce sites for 1,512 lower-income units to produce new housing opportunities throughout city.* • *Conduct one-on-one meetings with developers and property owners.* • *Proactively conduct outreach advertising available incentives, resources, and relevant information for the development of larger sites.* • *Establish, maintain, and promote an inventory of large sites appropriate for residential development.* • *Facilitate and streamline parceling, or other similar planning methods, to encourage the development of large sites with affordable housing components.*	*Ongoing, as projects come forward; establish program to connect property owners and developers by December 2025. Annually reach out to developers to gather input on available incentives. Annually conduct outreach and advertising. Facilitate and streamline parceling, or other similar actions, for large sites through 2031. Assess project approvals on large Housing Element inventory sites as of December 31, 2027. If approved projects are not in line with the City's RHNA projections on large sites in the inventory, within one year (by December 31, 2028) the City will identify additional sites beyond the large sites in the inventory in order to further facilitate residential development and if necessary will rezone to make the sites available for residential development.*

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
Goal HE-2: Provide High Quality Housing for All Income Groups		
11. Coordination with the Housing Authority of San Joaquin County	*Provide vouchers to 3,800 households in Stockton and assist these lower income households in accessing rental opportunities with Housing Choice Vouchers to facilitate housing mobility. Target additional outreach in areas with the highest concentration of children in single female-headed households, including parts of the Weston/Van Buskirk neighborhood, Downtown, and South Stockton.*	*Ongoing; establish education program by the end of 2024 and distribute information. Then distribute information at least annually through the end of the planning period.*
12. State and Federal Funding	*Fund 200 extremely low-, 400 very low-, 450 low-income units; Provide down payment assistance to 75 low-income households, particularly in high opportunity areas such as the Morada/Holman, Brookside/Country Club, Eight Mile/Bear Creek, and Midtown neighborhoods.*	*Review funding opportunities annually; down payment assistance program is ongoing*
13. Priority Sewer and Water Service for Affordable Housing	*Include in Development Code as part of Comprehensive Update*	*Include in Development Code as part of Comprehensive Update by April 2024*
14. Property Assessed Clean Energy (PACE) Program	*Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs. Program outreach will be prioritized in areas with high rates of homeowner overpayment, including the Mariposa Lakes neighborhood, parts of Downtown and East Stockton, the Industrial Annex area, and parts of the Pacific Avenue/Lincoln Village and Weston/Van Buskirk neighborhoods.*	*Ongoing. A unique, centralized location for this program on the City's website will be created by December 2025. Annual updating will occur thereafter.*
15. Green-Up Stockton	*Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs. Program outreach will be prioritized in areas with high rates of homeowner or renter overpayment, including the South and East Stockton, Midtown, Industrial Annex, Downtown, and Mariposa Lakes neighborhoods.*	*Ongoing*
16. Weatherization Activities	*200 units weatherized. Program outreach will be prioritized in lower-income neighborhoods and areas with high rates of homeowner or renter overpayment, including the South and East Stockton, Midtown, Industrial Annex, Downtown, and Mariposa Lakes neighborhoods. Additionally, outreach will be prioritized in the area southeast of the intersection of Thornton Road/Pacific Avenue and West Hammer Lane, where the city may be able to reach more senior households. Additional program outreach will target areas in relative proximity to agricultural employment including parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, the Morada/Holman neighborhood, and the North Stockton Annex*	*Program availability is ongoing. Advertising of the program by the City on the City website and direct outreach will begin by December 2024.*

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
	neighborhood. Additional outreach will be targeted in areas with the highest concentration of children in single female-headed households, including parts of the Weston/Van Buskirk neighborhood, Downtown, and South Stockton.	
Goal HE-3: Remove Governmental Constraints		
17. Development Code Revisions	*N/A*	*April 2024*
18. Fiscally Positive Impact Fees	*Provide exemptions and reductions to 200 housing units to reduce overpayment for housing costs and reduce displacement risk specifically for lower-income communities, including 30 units affordable to extremely low-income households.*	*Annually, evaluate exemptions provided and determine whether all constraints to housing development associated with impact fees or other funding mechanisms are sufficiently addressed. If it is found that they are not being addressed, modifications will be made to one or more exemption programs within one year. This will occur after each annual review until the end of the planning period. The City will evaluate the feasibility of providing impact or other development fee waivers or deferrals for projects with extremely low-income units by the end of 2025.*
19. Streamline Approvals for Affordable Housing Projects	*150 new affordable units permitted through SB 35 approval streamlining and development of 150 affordable units facilitated by using the adopted preliminary application form.*	*Develop or adopt HCD's SB 330 preliminary application form and develop an SB 35 streamlined approval process by December 2024 and implement as applications are received. The City will implement a minimum of two of the options listed in Program 19, to further streamline approvals and support affordable housing projects by December 2026.*
20. Density Bonuses	*Facilitate the construction of 1,000 lower-income units to increase mobility opportunities; encourage density bonus units in high-resource areas.*	*Complete as part of Comprehensive Development Code Update by April 2024; annually review Development Code and revise as needed; produce brochures and make information available on the City's website by December 2024.*
Goal HE-4: Preserve Existing Housing		
21. Preserve At-Risk Units	*Continue to monitor the 392 assisted units, and if any become at risk, work with property owners to develop a strategy to provide assistance to maintain or replace 392 at-risk units as affordable to reduce potential for displacement of tenants and loss of affordable housing stock in the city.*	*Ongoing communication with owners, service providers, and eligible potential purchasers; work with owners of deed-restricted units on an ongoing basis, in particular at the time of change of ownership.*

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
22. Housing Rehabilitation Programs	*Assist 300 lower-income units to address potential displacement, especially in areas of the city with the poorest housing conditions as identified during the windshield survey, including the Downtown area; areas in close proximity to agricultural employment opportunities such as parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, the Morada/Holman neighborhood, and the North Stockton Annex neighborhood; as well as any areas identified during the development of the HAP and Neighborhood Action Plans. Additional outreach will be targeted in areas with the highest concentration of children in single female-headed households, including parts of the Weston/Van Buskirk neighborhood, Downtown, and South Stockton. Of these units, assist 75 units with extremely low-income households..*	*Complete study and survey in 2023. Rehabilitation program is ongoing. Annually review the availability of funding opportunities and apply as opportunities become available.*
23. Code Enforcement Program	*Inspect 2,000 units annually, prioritizing areas with high potential need for rehabilitation, including the Downtown area; as well as areas in close proximity to agricultural employment opportunities including parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, the Morada/Holman neighborhood, and the North Stockton Annex neighborhood; as well as any areas identified during the development of the HAP and Neighborhood Action Plans.*	*Ongoing*
24. Replacement of Existing Affordable Units	*N/A*	*Ongoing*
Goal HE-5: Provide Equitable Housing and Supportive Services		
25. Continue to Support Organizations Assisting Homeless Persons	*Annually, assist up to 2,000 unduplicated homeless persons; and 1,000 households at-risk of homelessness with limited-term rental assistance or utility payments. Target outreach and distribute information about these programs in the downtown area, close to existing homeless services. As part of this, increase the number of board and care or other types of residential or transitional care facilities for vulnerable populations by 300-500 beds. Prioritize new residential or transitional care facilities for vulnerable populations in higher-opportunity areas or areas in close proximity to services, including the Midtown, Trinity/Northwest Stockton, Pacific Avenue/Lincoln Village, Eight Mile/Bear Creek, and Morada/Holman neighborhoods.*	*Apply for funding annually and provide funding to housing providers to fund on-site case managers and other support services annually. Provide operating support for organizations that provide basic services, outreach, and engagement annually. Provide financial support for the Coordinated Entry system annually through at least 2027.*

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
26. Continue to Assist the Disabled in Community Development Block Grant Project Areas	*Provide mobility assistance home-repair grants for 120 low-income individuals and households including those with special needs including disabilities, in Stockton, including rental units. Of these individuals or households, provide mobility assistance for home-repair grants for 5 extremely low-income individuals or households including those with special needs including disabilities.*	*Annually, contingent upon CDBG funding*
27. Universal Design	*100 housing units with universal design features to facilitate accessibility for persons with disabilities and seniors; encouraging at least five (5) of these units to be located near transit stations and services.*	*Make updates as part of the Comprehensive Development Code update by April 2024*
28. Assist Farm Workers and other Members of the Workforce	*Assist other organizations in developing at least 500 units or housing for farmworkers in Stockton or in the County during the planning period, including 300 in high and moderate resource areas in relative proximity to agricultural employment opportunities, including parts of the Weston/Van Buskirk neighborhood, the Industrial Annex, the Morada/Holman neighborhood, and the North Stockton Annex neighborhood.*	*Meet twice per year to explore opportunities for farmworker housing*
29. Addressing the Needs of Those with Disabilities	*By revising its Development Code to remove development constraints, the City will facilitate the development of 300 units for households with a household member who has a disability.*	*Revise the Reasonable Accommodation procedure including the findings as part of the Comprehensive Development Code Update by April 2024. Prepare public information on Reasonable Accommodations by June 2024. Continue to partner with the Valley Mountain Regional Center and review the materials on the City website annually starting in 2024 and update as needed after each annual review.*
30. Practices to Affirmatively Further Fair Housing	*See individual strategies bulleted in the program language at left with specific targets.*	*Refer to each strategy in this Affirmatively Furthering Fair Housing (AFFH) program for specific time frames.*
31. Environmental Health and Access to Resources	*See individual strategies bulleted in the program language at left with specific targets.*	*Refer to each strategy in this program for specific time frames.*
32. Removal of Racially Restrictive Covenants	*Remove all racially restrictive covenants from Stockton City-owned properties by December 2025 and assist in the removal of all known privately owned properties by the end of the 6th housing cycle. Advertise County program starting in 2025; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2025, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 20 property owners annually to support their efforts to remove restrictions from their deeds.*	*Remove all covenants on City-owned properties by December 2025; launch informational campaign between June and December 2025; encouragement of removal of covenants from private properties is ongoing.*

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
33. *Disperse Sites Suitable for Lower Income Housing to Affirmatively Further Fair Housing*	*1,193 additional lower income units on sites in relatively higher income and higher resource areas in neighborhoods such as Trinity/Northwest Stockton, Eight Mile Rd/Bear Creek, and Northeast of Morada Lane.*	*Make sites available including any needed General Plan or zoning code revisions, by December 31, 2026.*

QUANTIFIED OBJECTIVES

Table HE-1 below summarizes the City's quantified objectives for new construction, rehabilitation, preservation, and housing assistance over an eight-year time frame. These quantified objectives represent targets. They are estimates based on past experience, anticipated funding levels, and anticipated housing market conditions.

Table HE-1: SUMMARY OF QUANTIFIED OBJECTIVES
2023-2031

PROGRAM	EXTREMELY LOW	VERY LOW	LOW	MODERATE	ABOVE-MODERATE	TOTAL HOUSEHOLDS
New Construction[1]	*1,232*	*1,233*	*1,548*	*2,572*	*6,088*	***12,673***
Rehabilitation[2]	*700*	*900*	*900*	*-*	*-*	***2,500***
Conservation/Preservation of At-Risk Units[3]	*600*	*957*	*985*	*825*	*825*	***4,192***

Notes:

1. Corresponds to the City's RHNA.
2. Corresponds to objectives in Programs 16, 22, and 23.
3. Corresponds to the at-risk affordable assisted units in the city (see Housing Needs Assessment, Table HE-42 and Program 21) and objectives from Programs 11 and 14 aiming to conserve existing housing.

1 INTRODUCTION

State housing element law (Government Code Section 65580) mandates that local governments must adequately plan to meet the existing and projected housing needs of all economic segments of the community. This section provides a snapshot of current (2022) information on household characteristics, housing needs, housing supply, land inventory for new development, housing programs, constraints, and incentives for new housing development. It also evaluates progress made since the last Housing Element was adopted in 2015.

OVERVIEW OF STATE REQUIREMENTS

State law recognizes the vital role local governments play in the supply and affordability of housing. Each local government in California is required to adopt a comprehensive, long-term general plan for the physical development of their city or county. The housing element is one of eight mandated elements of the general plan. State law requires local government plans to address the existing and projected housing needs of all economic segments of the community through their housing elements. The law acknowledges that for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. As a result, housing policy in the state rests largely upon the effective implementation of local general plans and local housing elements in particular.

The purpose of the housing element is to identify the community's housing needs, to state the community's goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs, and to define the policies and programs that the community will implement to achieve the stated goals and objectives.

State law requires cities and counties to address the needs of all income groups in their housing elements. The official definition of these needs is provided by the California Department of Housing and Community Development (HCD) for each city and county within its geographic jurisdiction. Beyond these income-based housing needs, the housing element must also address special-needs groups such as persons with disabilities and homeless persons.

As required by State Housing Element Law (Government Code Section 65583(a)), the assessment and inventory for this Housing Element includes the following:

- Analysis of population and employment trends and projections and a quantification of the locality's existing and projected housing needs for all income levels. This section includes analysis of

"at-risk" assisted housing developments that are eligible to change from lower-income housing to market-rate housing during the next 10 years.

- Analysis and documentation of household characteristics, including level of payment compared to ability to pay, and housing characteristics, including overcrowding and housing stock condition.
- Analysis of any special housing needs for the elderly, persons with disabilities (including developmental disabilities), large households, farmworkers, families with female heads of household, and families and persons in need of emergency shelter.
- In 2018, California passed Assembly Bill (AB) 686 to address more subtle, discriminatory methods that reinforce patterns of segregation that persist in California today. The new legislation requires cities and counties to update their Housing Element to include an assessment of fair housing practices, an analysis of the relationship between available sites and areas of high or low resources, and concrete actions in the form of programs to affirmatively further fair housing. The purpose of this assessment and analysis is to proactively promote the replacement of segregated living patterns with truly integrated and balanced living patterns and to transform racially and ethnically concentrated areas of poverty into areas of opportunity.
- Inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning, public facilities, and services to these sites.
- Analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels and for persons with disabilities, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. Analysis of local efforts to remove governmental constraints.
- Analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, and the cost of construction.
- Analysis of opportunities for residential energy conservation.

The Housing Element identifies the nature and extent of the City's housing needs, which in turn provides the basis for the City's response to those needs in the Housing Element Policy Document. In addition to identifying housing needs, the element also presents information on the setting in which the needs occur, which provides a better understanding of the community and facilitates planning for housing.

The Housing Element sections draw on a broad range of information sources. Information on population, housing stock, and the economy comes primarily from the HCD pre-approved data package[1] as well as the 2020 US Census, American Community Survey (ACS), the California Department of Finance (DOF), and City of Stockton records. Information on available sites and services for housing comes from numerous public agencies. Information on constraints on housing production and past and current housing efforts in the City of Stockton comes from City staff, other public agencies, and a number of private sources.

GENERAL PLAN AND HOUSING ELEMENT CONSISTENCY

The Housing Element is a component of the 2040 General Plan, which provides guiding policy for all growth and development within the city. The General Plan consists of elements that address both State-mandated planning issues plus optional subjects that are of particular concern within Stockton. These elements are:

- Land Use
- Transportation

[1] San Joaquin Valley Regional Early Action Planning (REAP) Collaborative compiled a significant amount of data needed to update the Housing Element. Much of the data in the HCD pre-approved data. package is from the 2016-2020 American Community Survey. The source of information for the tables identifies when the data is from the data package.

- Safety
- Community Health

All State-mandated elements except the Housing Element are included in one of these elements as a sub-element. The Housing Element is updated in a separate State-dictated schedule from the rest of the General Plan. This Housing Element will be effective from December 31, 2023, through December 31, 2031. This Housing Element updates the City of Stockton Housing Element that was adopted in 2016. The City is also currently updating its Safety Element. During the update process, the City has conducted an internal consistency review to ensure consistency between the Housing and Safety Element and all other elements of the General Plan. The City will maintain consistency as future General Plan amendments are processed by evaluating proposed amendments for consistency with all elements of the General Plan, including the Housing Element.

GENERAL PLAN AND HOUSING ELEMENT DIFFERENCES

The housing element is one of eight State-mandated elements that every general plan must contain. Although the housing element must follow all the requirements of the general plan, the housing element has several State-mandated requirements that distinguish it from other general plan elements. Whereas the State allows local government the ability to decide when to update their general plan, State law sets the schedule for periodic update (eight-year time frame) of the housing element. Local governments are also required to submit draft and adopted housing elements to HCD for State law compliance review. This review ensures that the housing element meets the various State mandates. When the City satisfies these requirements, the State will "certify" that the element is legally adequate. Failing to comply with State law could result in potentially serious consequences, such as reduced access to infrastructure, transportation, and housing funding and vulnerability to lawsuits.

PUBLIC PARTICIPATION

As part of the Housing Element update process, the City is implementing the State's public participation requirements in Housing Element law, set forth in Government Code Section 65583(c)(7), that jurisdictions "…shall make a diligent effort to achieve participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort."

The City has sought to engage all segments of the community during the preparation of the Housing Element update, including the individuals, organizations, and agencies with which the City consulted; the methods of community outreach; and a summary of comments received and how these comments have been addressed. All segments of the community were encouraged by the City to participate in preparation of the Housing Element through a series of efforts, including noticing of property owners of sites in the draft Housing Element sites inventory, announcements on the City's social media channels, distribution to the Housing Element email listserv, and direct contacts by email and phone with organizations serving low-income and special-needs groups. The City invited representatives of these groups to attend the public workshops on the Housing Element. Spanish translation has been available at the workshop and translation into other languages has been available on request. Summaries of all outreach , input received, and the way input was incorporated into the Housing Element are described in Appendix B.

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EXISTING NEEDS ASSESSMENT

2

MAJOR FINDINGS

- Since 2005, Stockton has experienced an average annual growth rate (AAGR) of 0.9 percent and grew as a whole by 15.8 percent (an increase of 43,974 people). However, between 2021 and 2022, the population decreased by over 1,395. This was the first year of population decrease since 2008.
- Stockton's population was slightly younger than the county and state average in 2020. The city had a higher percentage of residents under the age of 34 than San Joaquin County, and the median age in Stockton (33.0) was lower than that of the county (34.4) and the state (36.7).
- Stockton's population was more ethnically and racially diverse than the county and state in 2020. Asian and Hispanic populations continue to make up about 64 percent of the population in Stockton.
- Between 2018 and 2020, the per-capita personal income increased by 20.3 percent in the City of Stockton, 13.9 percent in California, and 10.0 percent in the U.S. Although income increased in Stockton between 2018 and 2020 at a higher rate than income in California and the United States, as of 2020, average personal income in Stockton was approximately $7,500 less than the United States and approximately $18,000 less than California.
- Stockton's household income distribution is more heavily concentrated in the lower end of the income spectrum than the county and state. In 2020, 21.0 percent of Stockton households earned less than $25,000 compared to 17.0 percent countywide and 16.0 percent statewide. Households earning $100,000 or more made up 26.0 percent of Stockton households but accounted for 33.0 percent of households countywide and 39.7 percent of all California households.
- In August 2022, 9.7 percent of Stockton residents and San Joaquin County residents were unemployed, which was approximately twice the statewide unemployment rate (4.1 percent).
- Homeownership rates in Stockton decreased from 51.6 percent in 2000 to 45.1 percent in 2014 following the housing market crash and foreclosure crisis. Since then, it rebounded to 49.9 percent in 2020. However, Stockton's homeownership rate is lower than the countywide (57.7 percent) and statewide (55.3 percent) rates. Stockton has a greater need for large housing units than the county and state. Stockton had a larger average household size, smaller number of housing units, and higher overcrowding rates than the county and state.
- As of 2020, about 1.9 percent of Stockton's housing stock was built after 2010 and another

17.4 percent of the housing stock was built between 1990 and 1999. The majority of new home construction occurred prior to the recession from 2000 to 2007. According to the California Department of Housing and Community Development (HCD) Data Dashboard from January 1, 2016, to April 13, 2021, only 888 residential building permits were issued.

- The rate of housing cost burden for lower-income households is slightly higher in Stockton (75.0 percent) than in San Joaquin County (72.0 percent) and California (70.0 percent), pointing to a need for more affordable housing units in Stockton.
- The 2022 countywide point-in-time homeless count identified a total of 2,319 unsheltered persons in San Joaquin County, of which, 893 unsheltered persons were counted in Stockton.

INTRODUCTION

This section begins with a description of housing and demographic characteristics of Stockton. The section then discusses the existing housing needs of the city based on housing and demographic characteristics, and the housing needs of "special" population groups as defined in State law. Data for Stockton is presented, wherever possible, alongside data for San Joaquin County and California for comparison. This facilitates an understanding of the city's characteristics by illustrating how the city is similar to, or differs from, the county and state in various aspects related to demographic, employment, and housing characteristics and needs.

DEMOGRAPHIC AND EMPLOYMENT PROFILE

The purpose of this section is to establish "baseline" population, employment, and housing characteristics for Stockton. The main sources of the information in this section are the HCD pre-approved data package, 2020 American Community Survey (ACS) 5-Year Estimates (2016-2020), and the California Department of Finance (DOF). Other sources of information include the San Joaquin Council of Governments (SJCOG), the California Employment Development Department (EDD), and the U.S. Department of Housing and Urban Development (HUD), including HUD's Comprehensive Housing Affordability Strategy (CHAS). It is important to note that the ACS data is a multi-year estimate based on sample data and has a large margin of error. It is noted in the data source at the bottom of tables in this section where this data package was used.

DEMOGRAPHICS

Population

As shown in **Table HE-2,** overall, Stockton's population has grown steadily in the last two decades. Since 2005, Stockton has experienced an AAGR of 0.9 percent and grew as a whole by 15.8 percent (an increase of 43,974 people). However, between 2021 and 2022, the population decreased by over 1,395 residents. This was the first year of population decrease since 2008.

Table HE-3 shows the population growth rate in Stockton relative to San Joaquin County and the state of California. From 2000 to 2022, both the city of Stockton and the county as a whole grew at a faster rate than the state average. In each jurisdiction, population increased between 2000 and 2010 at approximately twice the rate of population growth between 2010 and 2022.

Table HE-2: Historical Population Change
Stockton, 2000-2022

YEAR	POPULATION	CHANGE	AAGR
2000	243,771		-
2005	278,515	34,744	2.9%
2006	284,418	5,903	2.1%
2007	295,070	10,652	3.7%
2008	275,885	-19,185	-6.5%
2009	287,584	11,699	4.2%
2010	292,747	5,163	0.4%
2011	296,367	3,620	1.2%
2012	297,975	1,608	0.5%
2013	298,115	140	0.0%
2014	302,405	4,290	1.4%
2015	306,138	3,733	1.2%
2016	309,829	3,691	0.2%
2017	313,255	3,426	1.1%
2018	315,099	1,844	0.6%
2019	317,356	2,257	0.7%
2020	319,188	1,832	0.6%
2021	323,884	4,696	1.5%
2022	322,489	-1,395	-0.4%

Source: DOF, Report E-4 Population Estimates for Cities, Counties, and the State, 2011-2022, with 2010 Census Benchmark; DOF, Table 2a Historical Census Populations of California State, Counties, Cities, Places, and Towns.

Age

Table HE-4 shows the distribution of Stockton's population by age in 2020. According to the 2020 ACS 5-Year Estimates (2016-2020), the median age in Stockton is 33.0 years, which is lower than the county (34.4 years) and the state (36.7 years). In 2020, 58.6 percent of the population in Stockton was 5 to 45 years of age. Young adults and middle-aged adults, which make up the workforce, may need homes near employment or transit centers with adequate size for families. Those 65 years and older represented about 12.5 percent of the population. When compared to San Joaquin County, the age distribution was similar although Stockton had a higher percentage of persons between the age of 45 and 64 and San Joaquin had a higher percentage of persons 65 and older.

Table HE-3: Population Change

Stockton, San Joaquin County, and California, 2000 to 2022

	STOCKTON			SAN JOAQUIN COUNTY			CALIFORNIA		
	2000	2010	2022	2000	2010	2022	2000	2010	2022
Population	243,771	291,707	322,489	556,229	685,306	784,298	33,873,086	37,253,956	39,185,605
Growth from Previous Period		47,936	30,782		129,077	98,992		3,380,870	1,931,649
AAGR from Previous Period		1.8%	**0.9%**		2.1%	**1.2%**		1.0%	**0.4%**

Source: U.S. Census.

Table HE-4: Age Characteristics

Stockton and San Joaquin County, 2020

AGE GROUP	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Under 5 Years	22,922	7.4%	52,370	13.7%	2,409,082	12.9%
5 to 17 Years	63,563	20.4%	57,392	15.0%	2,431,647	13.0%
18 to 24 Years	32,757	10.5%	59,177	15.5%	2,597,443	13.9%
25 to 34 Years	45,143	14.5%	34,731	9.1%	1,518,469	8.1%
35 to 44 Years	41,033	13.2%	20,997	5.5%	1,029,603	5.5%
45 to 54 Years	35,355	11.4%	10,858	2.8%	545,047	2.9%
55 to 64 Years	31,725	10.2%	11,504	3.0%	540,872	2.9%
65 to 74 Years	22,950	7.4%	29,126	7.6%	1,608,717	8.6%
75 to 84 Years	11,130	3.6%	54,303	14.2%	3,084,036	16.5%
85 Years and Over	4,525	1.5%	51,063	13.4%	2,923,877	15.6%
Total	**311,103**	**100.0%**	**381,521**	**100.0%**	**18,688,793**	**100.0%**

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

Race and Ethnicity

Table HE-5 summarizes data related to the race and ethnicity of residents of Stockton, San Joaquin County, and California in 2020. Compared to San Joaquin County and California, Stockton is more racially and ethnically diverse. In 2020, approximately 43.5 percent of the city's population was Hispanic or Latino, compared to 41.7 percent in the county and 39.1 percent in the state. The city also has a higher proportion of persons identifying as Asian at 20.5 percent, compared to the county at 15.5 percent and state at 14.6 percent. Additionally, 11.0 percent of Stockton's population was Black or African American, which is a greater proportion than countywide at 6.8 percent and statewide at 5.4 percent. Stockton has a smaller percentage of whites at 19.4 percent compared to 30.7 percent in the county and 36.5 percent in the state.

Table HE-5: Population Breakdown by Race/Ethnicity

Stockton, San Joaquin County, and California, 2020

RACE/ETHNICITY	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Hispanic or Latino	*135,457*	*43.5%*	*313,385*	*41.7%*	*15,380,929*	*39.1%*
Not Hispanic or Latino						
White	*60,442*	*19.4%*	*230,857*	*30.7%*	*14,365,145*	*36.5%*
Black or African American	*34,195*	*11.0%*	*50,920*	*6.8%*	*2,142,371*	*5.4%*
American Indian and Alaska Native	*493*	*0.2%*	*1,447*	*0.2%*	*131,724*	*0.3%*
Asian	*63,657*	*20.5%*	*116,618*	*15.5%*	*5,743,983*	*14.6%*
Native Hawaiian and Other Pacific Islander	*1,404*	*0.5%*	*4,228*	*0.6%*	*135,524*	*0.3%*
Some Other Race	*1,252*	*0.4%*	*2,043*	*0.3%*	*124,148*	*0.3%*
Two or more Races	*14,203*	*4.6%*	*32,117*	*4.3%*	*1,322,199*	*3.4%*
TOTAL POPULATION	***311,103***	***100%***	***751,615***	***100%***	***39,346,023***	***100%***

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

INCOME AND EMPLOYMENT

Local demand for housing is significantly impacted by income, employment characteristics, and regional job growth. To effectively address the housing and jobs relationship, an understanding of local salary and job profiles is needed. This section analyzes personal income, household income, and employment characteristics for San Joaquin County and the city of Stockton, when available.

Personal Income

Table HE-6 shows the change in average per-capita income for the Stockton Metropolitan Statistical Area (MSA), California, and the United States from 2018 to 2020. Between 2018 and 2020, the Per-Capita Personal Income increased by 20.3 percent in the City of Stockton, 13.9 percent in California, and 10.0 percent in the United States. Although income increased in Stockton between 2018 and 2020 at a higher rate than income in California and the United States, as of 2020, average personal income in Stockton was approximately $7,500 less than the United States and approximately $18,000 less than California.

Table HE-6: Personal Income[1]

Stockton, California, and United States, 2018 to 2020

PER-CAPITA PERSONAL INCOME[1]				
	2018	2019	2020	PERCENTAGE CHANGE
Stockton	*$43,077*	*$45,075*	*$51,816*	*20.3%*
California	*$61,633*	*$64,513*	*$70,192*	*13.9%*
United States	*$54,098*	*$56,047*	*$59,510*	*10.0%*

[1] Per-capita personal income was computed using Census Bureau midyear population estimates.

Source: Department of Commerce, Bureau of Economic Analysis, 2020.

Household Income

As shown in Table HE-7, household incomes in Stockton are generally lower than incomes countywide and in the state. The most significant income disparities when comparing Stockton with the county or state occur at either end of the income spectrum. For example, 21.0 percent of Stockton households earned less than $25,000 in 2020 compared to 17.0 percent countywide and 16.0 percent statewide. Households earning $100,000 or more made up 26.0 percent of Stockton households but accounted for 33.0 percent of households countywide and 39.7 percent of all California households.

Table HE-7: Household Income Distribution

Stockton, San Joaquin County, and California, 2020

INCOME	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Less than $29,999	*24,229*	*25.4%*	*48,181*	*20.9%*	*2,486,133*	*19.0%*
$30,000-$44,999	*10,271*	*10.8%*	*27,050*	*11.7%*	*1,377,391*	*10.5%*
$45,000-$59,999	*11,434*	*12.0%*	*26,081*	*11.3%*	*1,258,858*	*9.6%*
$60,000-$74,999	*9,869*	*10.4%*	*23,343*	*10.1%*	*1,162,681*	*8.9%*
$75,000- $125,000	*20,420*	*21.4%*	*53,173*	*23.0%*	*2,911,428*	*22.2%*
Above $125,000	*19,013*	*20.0%*	*53,264*	*23.0%*	*3,906,623*	*29.8%*
Total	***95,236***	***100.0%***	***231,092***	***100.0%***	***13,103,114***	***100.0%***
Median Income	*$58,393*		*$68,628*		*$78,672*	

Source: American Community Survey (2016-2020)

Income Categories and the Regional Housing Needs Allocation

The Regional Housing Needs Allocation (RHNA) for the Housing Element planning period from December 31, 2023, through December 31, 2031, for San Joaquin County as a whole is 52,719. SJCOG developed a methodology to sub-allocate the county-level projection to the unincorporated county and the cities of Escalon, Lathrop, Lodi, Manteca, Ripon, Tracy, and Stockton. Of the total 52,719 needed units in the SJCOG region, 12,673 are allocated to the City of Stockton.

Per State law, SJCOG further divided the housing need for each jurisdiction into four income categories. This division is intended to ensure adequate affordable housing for all income levels in the region. The four categories are Very Low Income, Low Income, Moderate Income, and Above Moderate Income. According to California Government Code Section 65583(a)(1), the City may "presume that 50 percent of the very low-income households qualify as extremely low-income households." Stockton's RHNA by income category is shown in Table HE-8 alongside representative income ranges that correlate with the RHNA categories.

The income categories shown in Table HE-8 are additionally used for the purpose of determining eligibility for housing assistance through State, federal and local programs. HCD publishes these income limits for the following categories annually for each county in California.

Table HE-8: Income Limits for San Joaquin County and Regional Housing Needs Allocation

2022

INCOME CATEGORY	2022 INCOME RANGE (HOUSEHOLD OF 4)	RHNA	RHNA PERCENT-AGE
Extremely Low <30% of Median Income	<$27,750	2,465*	19.5%
Very Low Income 31-50% of Median Income	$27,751 - $41,400		
Low Income 51-80% of Median Income	$41,401 - $66,200	1,548	12.2%
Moderate Income 81-120% of Median Income	$66,201 - $102,000	2,572	20.3%
Above Moderate Income >120% of Median Income	>$102,000	6,088	48.0%
	Total RHNA	**12,673**	**100%**

HCD 2022 Median Income for a household of four in San Joaquin County: $85,000

*For purposes of the Housing Element, it is assumed that 50 percent of the City's RHNA allocation of very low-income units represents the additional housing needed to be provided for extremely low-income households.

Sources: California Department of Housing and Community Development, State Income Limits for San Joaquin County, 2022; San Joaquin County Subregion 6th Cycle Regional Housing Needs Allocation, Final Methodology

Table HE-9: Top Employers in the City of Stockton

City of Stockton, 2021

EMPLOYERS	NUMBER OF EMPLOYEES
Stockton Unified School District	5,205
St. Joseph's Medical Center	4,600
Amazon	2,100
City of Stockton	2,099
San Joaquin County	2,000
Pacific Gas and Electric Company	1,550
Lincoln Unified School Distinct	1,212
Kaiser Permanente	1,065
University of the Pacific	1,021
San Joaquin Delta College	1,007
Total	**21,859**

Source: Annual Comprehensive Financial Report, City of Stockton, 2021

Employment

Table HE-9 shows the top employers in the City of Stockton in 2021 by number of employees. The top employers in Stockton were the Stockton Unified School District, St. Joseph's Medical Center, and Amazon. Table HE-10 shows industry employment by major classification for Stockton, San Joaquin County, and California in 2020. Whether living in Stockton or elsewhere in the county or state, the most common industry of employment was Educational and Health Services (22.0 percent in Stockton, 21.0 percent in San Joaquin County and California. In Stockton and San Joaquin County, this was followed by Retail Trade (12.0 percent), while the second most common industry of employment statewide was Professional, Scientific, and Management, and Administrative, and Waste Management Services (14.0 percent).

Table HE-10: Employment by Industry

Stockton, San Joaquin County, and California, 2020

	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Jobs by Place of Employment						
Agriculture, Forestry, Fishing and Hunting, and Mining	5,010	3.9%	14,472	4.5%	394,290	2.1%
Construction	9,207	7.1%	27,114	8.5%	1,190,537	6.4%
Manufacturing	10,425	8.1%	30,223	9.5%	1,676,497	9.0%
Wholesale Trade	3,679	2.9%	9,655	3.0%	514,234	2.8%
Retail Trade	15,650	12.1%	37,996	11.9%	1,942,421	10.4%
Transportation, Warehousing, and Utilities	12,342	9.6%	27,176	8.5%	1,028,818	5.5%
Information	1,358	1.1%	4,015	1.3%	542,674	2.9%
Financial Activities	5,690	4.4%	14,579	4.6%	1,118,253	6.0%
Professional, Scientific, and Management, and Administrative, and Waste Management Services	10,947	8.5%	30,877	9.7%	2,581,266	13.8%
Educational and Health Services	28,702	22.3%	65,614	20.5%	3,960,265	21.2%
Arts, Entertainment, and Recreation, and Accommodation and Food Services	11,358	8.8%	25,917	8.1%	1,894,858	10.2%
Other Services	7,090	5.5%	15,573	4.9%	952,302	5.1%
Public Administration	7,494	5.8%	16,597	5.2%	850,479	4.6%

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

Table HE-11 illustrates average annual unemployment rates in Stockton, San Joaquin County, and California from January 2010 to August 2022. Throughout the timeline, the unemployment rate in Stockton and San Joaquin County has been consistently higher than statewide, with Stockton's rate slightly higher than the county's rate. Overall, the unemployment rate in Stockton, San Joaquin County, and California steadily decreased by an average of 8.0 percent from January 2010 to August 2022. In August 2022, 9.7 percent of Stockton residents and San Joaquin County residents were unemployed, which was approximately twice the statewide unemployment rate (4.1 percent).

Table HE-11: Unemployment Rate

Stockton, San Joaquin County, and California, January 2010 to August 2022

YEAR	STOCKTON	SAN JOAQUIN COUNTY	CALIFORNIA
2010	18.1%	16.9%	12.5%
2011	17.7%	16.5%	11.9%
2012	15.7%	14.6%	10.5%
2013	13.4%	12.5%	9.0%
2014	11.5%	10.7%	7.6%
2015	9.7%	8.9%	6.3%
2016	9.1%	8.2%	5.5%
2017	8.1%	7.0%	4.8%
2018	7.1%	6.1%	4.3%
2019	7.0%	6.0%	4.1%
2020	13.2%	11.6%	10.2%
2021	10.0%	8.7%	7.3%
2022[1]	9.7%	9.7%	4.1%

Note: Rates shown are a percentage of the labor force.

[1] August 2022.

Source: Employment Development Department; Unemployment Rate (2010-2021), 2022.

POPULATION AND EMPLOYMENT PROJECTIONS

SJCOG produces projections of population and employment for the cities in San Joaquin County, including Stockton. SJCOG's most recent projections, released in 2016, cover the period from 2020 to 2045. Table HE-12 shows SJCOG's population and employment estimates using 2015 as the base year with population and employment projections through 2045.

As shown in Table HE-12, Stockton's population is projected to increase at an average annual rate of 1.4 percent from 329,729 in 2020 to 463,445 in 2045 (total increase of 40.6 percent). The report was released in 2016 and does not account for the loss of jobs from the COVID-19 pandemic. According to the report, employment growth in Stockton is projected to occur at a lower rate than population growth. The number of jobs is projected to increase at an average rate of 1.2 percent each year from 121,350 jobs in 2020 to 158,946 in 2045 (total increase of 31.0 percent). The ratio of jobs per capita is projected to decline slightly from 0.4 jobs per person estimated in 2020 to 0.3 jobs per person estimated in 2045.

Table HE-12: Population and Employment Projections

Stockton, 2015 - 2045

YEAR	POPULATION		EMPLOYMENT		JOBS/ POPU-LATION RATIO
	HOUSE-HOLDS	AAGR	JOBS	AAGR	
2015	309,919	-	112,225	-	0.4
2020	329,729	1.3%	121,350	1.6%	0.4
2025	352,239	1.4%	128,522	1.3%	0.4
2030	374,939	1.3%	136,280	1.2%	0.4
2035	401,961	1.4%	144,228	1.2%	0.4
2040	432,627	1.5%	151,979	1.1%	0.4
2045	463,445	1.4%	158,946	0.9%	0.3

Source: Center for Business and Policy Research 2015 to 2045 Population, Household, Employment Update, 2016.

HOUSEHOLD CHARACTERISTICS AND HOUSING SUPPLY

This section provides an analysis of household characteristics and housing supply. The first section analyzes household characteristics, such as household population, composition, size, tenure, and overcrowding. The second section analyzes the city's housing inventory and supply, including a discussion of vacant units.

The US Census defines a household as consisting of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit, such as partners or roomers, is also counted as a household. Data on households does not include people living in group homes. The US Census defines group quarters as places where people live or stay in a group living arrangement that is owned or managed by an organization providing housing and/or services for the residents. Group quarters include such places as college residence halls, residential treatment centers, skilled nursing facilities, group homes, military barracks, prisons, and worker dormitories.

The US Census defines a family as a group of two or more people (one of whom is the householder) related by birth, marriage, or adoption and residing together. However, to facilitate fair housing, and remove constraints (for example housing for people with disabilities) under State Housing Element law, local jurisdictions are required to define "family" in a manner that does not distinguish between related and unrelated persons and does not impose limitations on the number of people that may constitute a family.

The US Census defines a family household as a household maintained by a householder who is in a family (as defined previously) and includes any unrelated people (unrelated subfamily members and/or secondary individuals) who may be residing there. In US Census data, the number of family households is equal to the number of families. However, the count of family household members differs from the count of family

members in that the family household members include all people living in the household, whereas family members include only the householder and his/her relatives. In US Census data, a nonfamily household consists of a householder living alone (a one-person household) or where the householder shares the home exclusively with people to whom he/she is not related.

Families often prefer single-family homes to accommodate children, while single persons often occupy smaller apartments or condominiums. Single-person households often include seniors living alone or young adults.

HOUSEHOLD CHARACTERISTICS

Household Population

Household population is an important measure for establishing the number of persons residing in private households. Persons in institutional or group quarters are not included in the count of household population. According to the 2020 ACS 5-Year Estimates (2016-2020), as of 2020, Stockton had a total population of 319,188 comprising 95,236 households. The city had an average of 3.20 persons per household.

Household Composition

The U.S. Census divides households into two different categories, depending on their composition: family and nonfamily. Family households are those consisting of two or more related persons living together and may also include nonrelated individuals. Nonfamily households include persons who live alone or in groups composed of unrelated individuals. As shown in Table HE-13, family households have made up a larger share of the population in Stockton and San Joaquin County than the state average. In 2020, 72.5 percent of Stockton households were family households compared to 74.7 percent countywide and 68.6 percent in the state. These proportions are very close to what they were in 2013 and 2000.

Table HE-13: Family and Nonfamily Households

Stockton, San Joaquin County, and California, 2000, 2013, and 2020

	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
2000						
Family Households	56,186	71.5%	134,708	74.2%	7,920,049	68.9%
Nonfamily Households	22,370	28.5%	46,921	25.8%	3,582,821	31.1%
Total Households	**78,556**	**100.00%**	**181,629**	**100.00%**	**11,502,870**	**100.00%**
2013						
Family Households	66,226	73.3%	160,476	74.4%	8,603,822	68.6%
Nonfamily Households	24,146	26.7%	55,087	25.6%	3,938,638	31.4%
Total Households	**90,372**	**100.00%**	**215,563**	**100.00%**	**12,542,460**	**100.00%**
2020						
Family Households	69,029	72.5%	172,583	74.7%	8,986,666	68.6%
Nonfamily Households	26,207	27.5%	58,509	25.3%	4,116,448	31.4%
Total Households	**95,236**	**100.00%**	**231,092**	**100.00%**	**13,103,114**	**100.00%**

Source: 2000 U.S. Census, 2014 American Community Survey; 2016-2020 American Community Survey 5-Year Estimates.

Tenure

Tenure is a measure of the rates of homeownership in a jurisdiction. Tenure for a type of unit and the number of bedrooms can help estimate demand for a diversity of housing types. The owner versus renter distribution of a community's housing stock influences several aspects of the local housing market. Residential stability is influenced by tenure, with ownership housing typically having a much lower turnover rate than rental housing.

Home equity is the largest single source of household wealth for most Americans. According to the National Builders Association in 2021, on average, homeowners had a median net worth of $255,000, which is approximately 40 times the median net worth of renters ($6,300), which reflects the value of homeownership.

Table HE-14 shows rates of homeownership and renter occupancy in Stockton in 2000, 2014, and 2020, and San Joaquin County and California in 2020. Homeownership rates in Stockton decreased from 51.6 percent in 2000 to 45.1 percent in 2014 following the housing market crash and foreclosure crisis. Since then, it rebounded to 49.9 percent in 2020. However, Stockton's homeownership is lower than countywide (57.7 percent) and statewide (55.3 percent) rates.

Table HE-14: Tenure

Stockton, San Joaquin County, and California, 2000, 2014, and 2020

	STOCKTON						SAN JOAQUIN COUNTY		CALIFORNIA	
	2000		2014		2020		2020		2020	
	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT
Owner Occupied	40,534	51.6%	42,962	45.1%	47,481	49.9%	133,381	57.7%	7,241,318	55.3%
Renter Occupied	38,022	48.4%	52,204	54.9%	47,755	50.1%	97,711	42.28%	5,861,796	44.7%
Total Units	78,556	100.0%	95,166	100.0%	95,236	100.0%	231,092	100.0%	13,103,114	100.0%

Source: 2000 U.S. Census, 2014 American Community Survey; 2016-2020 American Community Survey 5-Year Estimates

Overcrowding

U.S. Census Bureau standards define a housing unit as overcrowded when the total number of occupants is greater than one person per room, excluding kitchens, porches, balconies, foyers, halls, half-rooms, or bathrooms. For example, if there were more than five people living in a home with five rooms (three bedrooms, living room, and dining room), it would be considered overcrowded. Units with more than 1.5 persons per room are considered severely overcrowded and should be recognized as a significant housing problem.

Table HE-15 compares housing overcrowding data for Stockton with data for San Joaquin County and California. In 2020, 90.7 percent of Stockton's households had 1.0 or fewer persons per room with only 9.2 percent considered overcrowded or severely overcrowded. Of all units in Stockton, 6.6 percent had between 1.01 and 1.5 persons per room, and 2.6 percent were severely overcrowded with more than 1.51 persons per room. Overcrowding was slightly more of a problem in Stockton in 2020 than countywide, where 5.6 percent of all households had more than 1.0 persons per room, and in California, where 8.2 percent of households were considered overcrowded.

Overcrowding is typically more of a problem in rental units than owner-occupied units. Only 6.0 percent of Stockton's owner households were overcrowded, while 12.4 percent of renter households were overcrowded in 2020. Countywide, 2.9 percent of owner households and 12.0 percent of renter households were overcrowded. Statewide, overcrowding was also greater among renter households (13.2 percent) compared to owner households (4.2 percent).

Table HE-15: Overcrowding
Stockton, San Joaquin County, and California, 2020

	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Owner-Occupied (persons per room)						
1.0 or less	44,601	93.9%	219,709	97.1%	6,938,861	95.8%
Overcrowded 1.01 to 1.5	2,058	4.3%	4,980	2.2%	223,040	3.1%
Severely Overcrowded 1.51 or more	822	1.7%	1,586	0.7%	79,417	1.1%
Total	**47,481**	**100.0%**	**226,275**	**100.0%**	**7,241,318**	**100.0%**
Renter-Occupied (persons per room)						
1.0 or less	41,814	87.6%	86,044	88.1%	5,088,515	86.8%
Overcrowded 1.01 to 1.5	4,270	8.9%	8,098	8.3%	457,713	7.8%
Severely Overcrowded 1.51 or more	1,671	3.5%	3,569	3.7%	315,568	5.4%
Total	**47,755**	**100.0%**	**97,711**	**100.0%**	**5,861,796**	**100.0%**
Total Occupied Housing Units (persons per room)						
1.0 or less	86,415	90.7%	305,753	94.4%	12,027,376	91.8%
Overcrowded 1.01 to 1.5	6,328	6.6%	13,078	4.0%	680,753	5.2%
Severely Overcrowded 1.51 or more	2,493	2.6%	5,155	1.6%	394,985	3.0%
Total	**95,236**	**100.0%**	**323,986**	**100.0%**	**13,103,114**	**100.0%**

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

Household Size

Table HE-16 shows average household size by tenure for Stockton, San Joaquin County, and California in 2020. Stockton had a greater percentage (21.2 percent) of large households (five or more members) than countywide (19.6 percent) and in California (13.8 percent). Relative to the state, Stockton and San Joaquin County had a much greater percentage of large, renter-occupied households (21.8 percent and 21.0 percent compared to 13.8).

Table HE-17 shows the number of bedrooms per housing unit by tenure in Stockton, San Joaquin County, and California in 2020. As shown in the table, 63.8 percent of all housing units in Stockton contained three or more bedrooms in 2020. This is slightly lower than the percentage of units with three or more bedrooms countywide (68.5 percent) and higher than California (56.0 percent).

Renter-occupied units typically have a smaller number of bedrooms than owner-occupied units. This was the case in Stockton in 2020, where 85.2 percent of owner-occupied units had three or more bedrooms, compared to only 42.5 percent of renter-occupied units. The percentage of renter-occupied units in Stockton with three of more bedrooms was lower than the percentage countywide (44.6 percent) but higher than California (27.8 percent).

Table HE-16: Household Size by Tenure

Stockton, San Joaquin County, and California, 2020

	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Owner Occupied						
1 Person	9,617	20.3%	24,428	18.3%	1,416,913	19.6%
2-4 Persons	28,151	59.3%	84,113	63.1%	4,822,685	66.6%
5 Persons or more	9,713	20.5%	24,840	18.6%	1,001,720	13.8%
Total	**47,481**	**100.0%**	**133,381**	**100.0%**	**7,241,318**	**100.0%**
Renter Occupied						
1 Persons	11,557	24.2%	22,175	22.7%	1,697,906	29.0%
2-4 Persons	25,766	54.0%	55,055	56.3%	3,356,092	57.3%
5 Persons or more	10,432	21.8%	20,481	21.0%	807,798	13.8%
Total	**47,755**	**100.0%**	**97,711**	**100.0%**	**5,861,796**	**100.0%**
All Households						
1 Person	21,174	22.2%	46,603	20.2%	3,114,819	23.8%
2-4 Persons	53,917	56.6%	139,168	60.2%	8,178,777	62.4%
5 Persons or more	20,145	21.2%	45,321	19.6%	1,809,518	13.8%
Total	**95,236**	**100.0%**	**231,092**	**100.0%**	**13,103,114**	**100.0%**

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

Table HE-17: Number of Bedrooms by Tenure

Stockton, San Joaquin County, and California, 2020

	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Owner Occupied						
No bedroom	328	0.7%	699	0.5%	50,963	0.7%
1 bedroom	388	0.8%	1,589	1.2%	173,846	2.4%
2 bedrooms	6,294	13.3%	16,453	12.3%	1,307,148	18.1%
3 bedrooms	22,332	47.0%	62,621	46.9%	3,228,533	44.6%
4 bedrooms	13,829	29.1%	40,609	30.4%	1,964,487	27.1%
5 or more bedrooms	4,310	9.1%	11,410	8.6%	516,341	7.1%
Total	**47,481**	**100.0%**	**133,381**	**100.0%**	**7,241,318**	**100.0%**
Renter Occupied						
No bedroom	2,737	5.7%	4,582	4.7%	496,503	8.5%
1 bedroom	8,255	17.3%	14,839	15.2%	1,512,885	25.8%
2 bedrooms	16,491	34.5%	34,668	35.5%	2,220,822	37.9%
3 bedrooms	14,035	29.4%	30,493	31.2%	1,189,552	20.3%
4 bedrooms	5,501	11.5%	11,472	11.7%	372,132	6.3%
5 or more bedrooms	736	1.5%	1,657	1.7%	69,902	1.2%
Total	**47,755**	**100.0%**	**97,711**	**100.0%**	**5,861,796**	**100.0%**
All Occupied Housing Units						
No bedroom	3,065	3.2%	5,281	2.3%	547,466	4.2%
1 bedroom	8,643	9.1%	16,428	7.1%	1,686,731	12.9%
2 bedrooms	22,785	23.9%	51,121	22.1%	3,527,970	26.9%
3 bedrooms	36,367	38.2%	93,114	40.3%	4,418,085	33.7%
4 bedrooms	19,330	20.3%	52,081	22.5%	2,336,619	17.8%
5 or more bedrooms	5,046	5.3%	13,067	5.7%	586,243	4.5%
Total	**95,236**	**100.0%**	**231,092**	**100.0%**	**13,103,114**	**100.0%**

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

Average household size is a function of household population (group quarters population is not counted) divided by the number of occupied housing units. Table HE-18 shows the average household size for Stockton, San Joaquin County, and California. The average number of persons per household in Stockton increased slightly from 3.02 in 2000 to 3.17 in 2012 to 3.20 in 2020. The average household sizes in Stockton in 2020 were similar to those countywide (3.18) during this time period, and slightly larger than the statewide average (2.94). Both Stockton and San Joaquin County had greater average household sizes in 2020 for owner-occupied households (3.23 and 3.18) compared to renter-occupied households (3.16 and 3.17).

Table HE-18: Average Household Size by Tenure
Stockton, San Joaquin County, and California, 2000, 2012, and 2020

TENURE	STOCKTON			SAN JOAQUIN COUNTY			CALIFORNIA		
	2000	2012	2020	2000	2012	2020	2000	2012	2020
All Households	3.02	3.17	3.20	3	3.14	3.18	2.87	2.94	2.94
Owner Occupied	3.01	3.14	3.23	2.98	3.07	3.18	2.95	2.98	3.01
Renter Occupied	3.03	3.2	3.16	3.03	3.23	3.17	2.78	2.88	2.85

Source: 2008-2012 American Community Survey; 1990 and 2000 U.S. Census; 2016-2020 American Community Survey 5-Year Estimates.

Based on the information regarding housing units and household sizes, Stockton has a greater need for large housing units than the county and state. Stockton had a larger average household size, smaller housing units, and higher overcrowding rates than the county and state in 2020.

HOUSING INVENTORY AND SUPPLY

Housing Units

Table HE-19 compares housing stock data by structure type for Stockton, San Joaquin County, and California in 2014 and 2020. The table shows the total housing stock in each area according to the type of structures in which units are located. Single-family detached housing units accounted for the majority of housing in Stockton in 2020. At 67.1 percent of the total housing stock, single-family detached units in Stockton made up a much larger share of the total than in the state overall, where only 57.7 percent of all units are single-family detached units. From 2014 to 2020, 2,649 single-family detached units were built in Stockton, representing 3.7 percent change for all new single-family residential units constructed. The majority of new home construction occurred prior to the recession from 2000 to 2007. According to the HCD Data Dashboard from January 1, 2016, to April 13, 2021, only 888 residential building permits were issued.

Multifamily housing complexes with five or more units make up the next-largest segment of Stockton's housing stock, comprising 17.7 percent (18,043 units) of the total in 2020. Between 2014 and 2020, only 61 units were built in multifamily complexes with five or more units. Between 2014 and 2020, the number of mobile homes in the city increased, and the overall share of mobile homes as a percentage of the entire housing stock stayed the same at 1.1 percent for 2014 and 2020.

Table HE-19: Housing Units by Type

Stockton, San Joaquin County, and California, 2014 and 2020

YEAR		TOTAL UNITS	SINGLE-FAMILY		MULTIFAMILY		MOBILE HOMES	BOAT, RV, VAN, ETC.
			DETACHED	ATTACHED	2 TO 4	5 PLUS		
Stockton								
2014	#	100,025	64,841	7,058	9,036	17,982	1,108	-
	%	100.0%	64.8%	7.1%	9.0%	18.0%	1.1%	-
2020	#	101,954	68,412	6,136	8,180	18,043	1,161	22
	%	100.0%	67.1%	6.0%	8.0%	17.7%	1.1%	0.0%
San Joaquin County								
2014	#	236,943	179,059	12,279	14,862	29,158	8,585	-
	%	100.0%	72.6%	5.2%	6.3%	12.3%	3.6%	-
2020	#	245,192	181,875	10,990	14,045	30,024	8,074	184
	%	100.0%	74.2%	4.5%	5.7%	12.2%	3.3%	0.1%
California								
2014	#	13,845,281	8,038,217	972,976	1,119,175	3,154,907	560,000	-
	%	100.0%	58.1%	7.0%	8.1%	22.8%	4.0%	-
2020	#	14,210,945	8,206,621	1,009,488	1,113,840	3,350,125	515,666	15,205
	%	100.0%	57.7%	7.1%	7.8%	23.6%	3.6%	0.1%

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

Occupancy/Vacancy Rates

Table HE-20 shows the occupancy and vacancy rates for Stockton, San Joaquin County, and California in 2000, 2010, and 2020. Stockton and San Joaquin County had lower vacancy rates than the state average in 2000 until 2010, when all three jurisdictions increased to the 8 to 9 percent range. In 2020, the vacancy rates resumed the vacancy trends, with the city and county having lower rates than the state average.

Table HE-20: Occupancy/Vacancy

Stockton, San Joaquin County, and California, 2000, 2010, and 2020

	2000		2010		2020	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Stockton						
Occupied Units	78,522	95.60%	90,605	90.90%	99,084	95.90%
Vacant Units	3,603	4.4%	9,032	9.1%	4,234	4.1%
Total Housing Units	**82,125**	**100.0%**	**99,637**	**100.0%**	**103,318**	**100.0%**
San Joaquin County						
Occupied Units	181,629	96.00%	215,007	92.00%	247,542	95.74%
Vacant Units	7,531	4.0%	18,748	8.0%	11,024	4.3%
Total Housing Units	**189,160**	**100.0%**	**233,755**	**100.0%**	**258,566**	**100.0%**
California						
Occupied Units	11,502,870	94.20%	12,577,498	91.90%	13,612,650	93.34%
Vacant Units	711,679	5.8%	1,102,583	8.1%	971,348	6.7%
Total Housing Units	**12,214,549**	**100.0%**	**13,680,081**	**100.0%**	**14,583,998**	**100.0%**

Source: Department of Finance, E5, 2021-2022.

Table HE-21 provides details on the vacancy rates of different housing types for Stockton, San Joaquin County, and California in 2020.

Table HE-21: Vacant Units by Type
Stockton, San Joaquin County, and California, 2020

VACANCY STATUS	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
For rent	*2,455*	*2.6%*	*3,792*	*1.6%*	*227,993*	*1.7%*
For sale only	*411*	*0.4%*	*1,161*	*0.5%*	*77,702*	*0.6%*
Sold, not occupied	*380*	*0.4%*	*1,219*	*0.5%*	*53,437*	*0.4%*
Rented or sold; not occupied	*350*	*0.4%*	*741*	*0.3%*	*54,898*	*0.4%*
For seasonal, recreational, or occasional use	*455*	*0.5%*	*1,535*	*0.7%*	*378,023*	*2.9%*
For migrant workers	*0*	*0.0%*	*117*	*0.1%*	*3,326*	*0.0%*
Other vacant	*2,667*	*2.8%*	*5,535*	*2.4%*	*312,452*	*2.4%*
Total Vacant	***6,718***	***7.1%***	***14,100***	***6.1%***	***1,107,831***	***8.5%***
Total Units	***95,236***	***100.0%***	***231,092***	***100.0%***	***13,103,114***	***100.0%***

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

Housing Conditions

The U.S. Census provides limited data that can be used to infer the condition of Stockton's housing stock. For example, the Census reports on whether housing units have complete plumbing and kitchen facilities. A very small percentage of all housing units in Stockton lack complete plumbing or kitchen facilities (see Table HE-22), although a greater percentage of renter-occupied housing units lack these facilities compared to owner-occupied housing units.

Since housing stock age and condition are generally correlated, one Census variable that provides an indication of housing conditions is the age of a community's housing stock. As shown in Table HE-22, approximately two-thirds of Stockton's homes were built over 30 years ago. As of 2020, about 1.9 percent of Stockton's housing stock was built after 2010 and another 17.4 percent of the housing stock was built between 2000 and 2009.

Table HE-22 also shows the number and percentage of units lacking complete plumbing facilities and units lacking complete kitchen facilities. These rates were similar in Stockton as compared with San Joaquin County and California. In all three locations, rental units were more likely to lack complete plumbing or kitchen facilities, as compared with ownership units. This trend points to the need for home improvement programs focused on rental properties.

Based on an early 2023 survey of former redevelopment areas and opportunity zones, the City estimates that approximately 2,900 (or 4%) of homes are blighted and in need replacement citywide.

Table HE-22: Age of Housing Stock and Housing Stock Conditions by Tenure

Stockton, San Joaquin County, and California, 2020

	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Owner-Occupied Housing Units						
Built 2010 or later	974	2.1%	8,442	6.3%	272,900	3.8%
Built 2000 to 2009	11,499	24.2%	31,320	23.5%	924,495	12.8%
Built 1990 to 1999	7,461	15.7%	21,185	15.9%	811,147	11.2%
Built 1980 to 1989	6,335	13.3%	19,343	14.5%	1,068,601	14.8%
Built 1970 to 1979	7,610	16.0%	17,051	12.8%	1,175,870	16.2%
Built 1960 to 1969	3,520	7.4%	10,408	7.8%	906,490	12.5%
Built 1950 to 1959	3,966	8.4%	11,995	9.0%	1,077,380	14.9%
Built 1940 to 1949	2,743	5.8%	6,315	4.7%	430,809	5.9%
Built 1939 or earlier	3,373	7.1%	7,322	5.5%	573,626	7.9%
Total	**47,481**	**100.0%**	**133,381**	**100.0%**	**7,241,318**	**100.0%**
Units Lacking Complete Plumbing Facilities	74	0.2%	342	0.3%	17,434	0.2%
Units Lacking Complete Kitchen Facilities	135	0.3%	658	0.5%	36,908	0.5%
Renter-Occupied Housing Units						
Built 2010 or later	858	1.8%	3,374	3.5%	256,413	4.4%
Built 2000 to 2009	5,082	10.6%	12,571	12.9%	508,460	8.7%
Built 1990 to 1999	5,787	12.1%	12,027	12.3%	637,220	10.9%
Built 1980 to 1989	7,231	15.1%	15,380	15.7%	898,705	15.3%
Built 1970 to 1979	10,368	21.7%	18,071	18.5%	1,114,211	19.0%
Built 1960 to 1969	5,767	12.1%	11,573	11.8%	834,432	14.2%
Built 1950 to 1959	5,008	10.5%	10,681	10.9%	689,973	11.8%
Built 1940 to 1949	3,357	7.0%	5,964	6.1%	332,220	5.7%
Built 1939 or earlier	4,297	9.0%	8,070	8.3%	590,162	10.1%
Total	**47,755**	**100.0%**	**97,711**	**100.0%**	**5,861,796**	**100.0%**
Units Lacking Complete Plumbing Facilities	323	0.7%	467	1.0%	23,476	0.4%
Units Lacking Complete Kitchen Facilities	1,012	2.1%	1,905	4.0%	128,184	2.2%
Total Occupied Housing Units						
Built 2010 or later	1,832	1.9%	11,816	5.1%	529,313	4.8%
Built 2000 to 2009	16,581	17.4%	43,891	19.0%	1,432,955	12.9%
Built 1990 to 1999	13,248	13.9%	33,212	14.4%	1,448,367	13.1%
Built 1980 to 1989	13,566	14.2%	34,723	15.0%	1,068,601	9.6%
Built 1970 to 1979	17,978	18.9%	35,122	15.2%	1,175,870	10.6%
Built 1960 to 1969	9,287	9.8%	21,981	9.5%	1,740,922	15.7%
Built 1950 to 1959	8,974	9.4%	22,676	9.8%	1,767,353	15.9%
Built 1940 to 1949	6,100	6.4%	12,279	5.3%	763,029	6.9%
Built 1939 or earlier	7,670	8.1%	15,392	6.7%	1,163,788	10.5%
Total	**95,236**	**100.0%**	**231,092**	**100.0%**	**11,090,198**	**100.0%**
Units Lacking Complete Plumbing Facilities	397	0.4%	809	0.4%	40,910	0.4%
Units Lacking Complete Kitchen Facilities	1,147	1.2%	2,563	1.1%	165,092	1.5%

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

The Neighborhood Services Section of the Police Department enforces codes, laws, and regulations for the abatement of substandard housing conditions and blight issues. Code enforcement statistics from the Neighborhood Services Section provide a sense of the number of units that may need renovation, rehabilitation, or replacement in the city. As shown in Table HE-23, the Neighborhood Services Division processed 234,924 housing code enforcement cases over the past 17 years at an average of about 14,683 cases each year. The most common housing violations are deferred maintenance issues like plumbing leaks, worn/deteriorated materials, and lack of weather protection. Others include structural problems, raw sewage, exposed wiring, and other exterior housing problems. The majority of housing cases usually take a minimum of 45 days to resolve depending on the amount and severity of the violations.

Table HE-23: Code Enforcement Cases
Stockton, Fiscal Year 2005/06-2021/22

FISCAL YEAR	NUMBER OF CASES*
2005/06	13,866
2006/07	17,291
2007/08	19,522
2008/09	13,841
2009/10	12,703
2010/11	10,502
2011/12	10,102
2012/13	11,664
2013/14	14,190
2014/15	11,775
2015/16	13,138
2016/17	13,508
2017/18	16,285
2018/19	19,646
2019/20	12,320
2020/21	10,990
2021/22	13,581
Total	**234,924**

Note: *Includes addresses with graffiti consent forms on file
Source: Police Department, Neighborhood Services Division, November 2022.

Housing Affordability

Housing is classified as "affordable" if households do not pay more than 30 percent of income for payment of rent (including a monthly allowance for water, gas, and electricity) or monthly homeownership costs (including mortgage payments, taxes, and insurance). State law (California Government Code Section 65583(a)(2)) requires "an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition." Identifying and evaluating existing housing needs are a critical component of the housing element. This requires comparison of resident incomes with the local cost of housing. The analysis helps local governments identify existing housing conditions that require addressing and households with housing cost burdens or unmet housing needs. This section includes an analysis of housing cost burden, ability to pay for housing, and the cost of housing.

The data in this section uses HUD's Comprehensive Housing Affordability Strategy (CHAS) database. Income groups are shown in the CHAS tabulation based on the HUD-adjusted area median family income (AMI).

Housing Cost Burdens

This section provides an analysis of the proportion of households "overpaying for housing." An "excessive cost burden" is defined by HUD as gross housing costs exceeding 30 percent of gross monthly income. A "severe cost burden" is defined as gross housing costs exceeding 50 percent of gross monthly income.

Income groups are based on the HUD-adjusted AMI. The AMI is based on the Stockton Metropolitan Statistical Area (MSA), encompassing all of San Joaquin County. In 1974, Congress defined "low income" and "very low income" for HUD rental programs as incomes not exceeding 80 and 50 percent, respectively, of the AMI, as adjusted by HUD.[1]

Table HE-24 shows the CHAS special tabulation data from the 2014-2018 ACS regarding the percentage of households with an excessive housing cost burden

[1] Statutory adjustments now include upper and lower caps for areas with low or high ratios of housing costs to income and, for each non-metropolitan county, a lower cap equal to its state's non-metropolitan average. Estimates of the median family income and the official income cutoffs for each metropolitan area and non-metropolitan county are based on the most recent Decennial Census results and updated each year by HUD. Each base income cutoff is assumed to apply to a household of four, and official cutoffs are further adjusted by household size.

(greater than 30 percent) and severe cost burden (greater than 50 percent) by income group and tenure for Stockton, San Joaquin County, and California.

As shown in Table HE-24, 41.8 percent of all households in Stockton had an excessive housing cost burden in 2018. This rate is slightly higher than countywide (37.2 percent) and in California (39.5 percent). In Stockton, 21.0 percent of households had a severe housing cost burden in 2018 compared to 17.5 percent and 19.0 percent for San Joaquin County and California, respectively. As would be expected, housing cost burdens were more severe for households with lower incomes. Among lower-income households in Stockton (incomes less than or equal to 80 percent of the AMI), 75.0 percent of households had an excessive housing cost burden in 2018 compared to 15.8 percent of non-lower-income households. This rate of housing cost burden for lower-income households is slightly higher in Stockton than in San Joaquin County (72.0 percent) and California (70.0 percent). This data points to the need for more affordable housing units in Stockton to meet the needs of lower-income households.

Rates of housing cost burden were greater among low-income renter households than among low-income owner households for Stockton, San Joaquin County, and California. However, for non-lower-income renter households, rates of housing cost burden were lower than those of non-lower-income owner-occupied households. This trend was common across the city, county, and state. In Stockton, 79.4 percent of low-income renter households paid 30 percent or more of their monthly incomes for housing costs in 2018, compared to 63.5 percent of low-income owner households. Among moderate- and above moderate-income households, the percentage of owner households with excessive housing cost burdens was slightly higher than renter households (15.8 percent compared to 15.7 percent).

Table HE-24: Housing Cost Burden by Household Income Classification

Stockton, San Joaquin County, and California, 2014-2018

		STOCKTON			SAN JOAQUIN COUNTY			CALIFORNIA		
		OWNERS	RENTERS	TOTAL	OWNERS	RENTERS	TOTAL	OWNERS	RENTERS	TOTAL
Household Income <= 80% MFI (Low-Income Households)										
Total Households		**11,510**	**30,315**	**41,825**	**28,970**	**54,595**	**83,565**	**2,008,045**	**3,387,335**	**5,395,380**
Cost Burdened >30%	Number	7,305	24,080	31,385	17,935	42,250	60,185	1,222,400	2,556,085	3,778,485
	Percent	63.5%	79.4%	75.0%	61.9%	77.4%	72.0%	60.9%	75.5%	70.0%
Severely Cost Burdened >50%	Number	4,705	14,105	18,810	11,395	24,815	36,210	761,685	1,510,795	2,272,480
	Percent	40.9%	46.5%	45.0%	39.3%	45.5%	43.3%	37.9%	44.6%	42.1%
Household Income > 80% MFI (Moderate- and Above Moderate-Income Households)										
Total Households		**33,720**	**19,645**	**53,365**	**97,130**	**46,035**	**143,165**	**5,077,390**	**2,492,665**	**7,570,055**
Cost Burdened >30%	Number	5,325	3,090	8,415	15,995	8,195	24,190	916,480	419,965	1,336,445
	Percent	15.8%	15.7%	15.8%	16.5%	17.8%	16.9%	18.1%	16.8%	17.65%
Severely Cost Burdened >50%	Number	920	265	1,185	2,615	835	3,450	161,640	34,230	195,870
	Percent	2.7%	1.3%	2.2%	2.7%	1.8%	2.4%	3.2%	1.4%	2.6%
Total Households										
Total Households		**45,230**	**49,960**	**95,190**	**126,100**	**100,630**	**226,730**	**7,085,435**	**5,880,000**	**12,965,435**
Cost Burdened >30%	Number	12,630	27,170	39,800	33,930	50,445	84,375	2,138,880	2,976,050	5,114,930
	Percent	27.9%	54.4%	41.8%	26.9%	50.1%	37.2%	30.2%	50.6%	39.5%
Severely Cost Burdened >50%	Number	5,625	14,370	19,995	14,010	25,650	39,660	923,325	1,545,025	2,468,350
	Percent	12.4%	28.8%	21.0%	11.1%	25.5%	17.5%	13.0%	26.3%	19.0%

Source: Stockton Data Packet, 2022 -- CHAS (2014-2018).

Housing Cost and Affordability

Housing affordability can be inferred by comparing the cost of renting or owning a home in Stockton with the presumed maximum affordable housing costs for households at different income levels. This information can provide a picture of who can afford what size and type of housing. It can also indicate the type of households that would likely experience overcrowding or overpayment.

Housing affordability is based on AMI. According to HCD, the AMI for a four-person household in the San Joaquin County was $85,000 in 2022. Income limits for larger or smaller households were higher or lower, respectively, and are calculated using a formula developed by HCD (see Table HE-25).

The following section compares the cost limits for affordable owner and rental housing by income limit as defined by the California Health and Safety Code.[2] The State income limits are used in affordable housing programs and projects. Because above moderate-income households do not generally have problems locating affordable units, affordable housing is usually defined as units that are reasonably priced for low- and moderate-income households. The following list shows the definition of housing income limits.

- Extremely Low-Income Household is one whose combined income is between the floor set at the minimum Supplemental Security Income (SSI) and 30 percent of the AMI. A household of four is considered to be extremely low-income in Stockton if its combined income is $27,750 or less for the year 2022.
- Very Low-Income Household is one whose combined income is at or between 31 and 50 percent of the AMI. A household of four is considered to be very low-income in Stockton if its combined income is between $27,751 and $41,400 for the year 2022.
- Low-Income Household is one whose combined income is at or between 50 and 80 percent of the AMI. A household of four is considered to be low-income in Stockton if its combined income is between $41,401 and $62,200 for the year 2022.
- Moderate-Income Household is one whose combined income is at or between 81 and 120 percent of the AMI. A household of four is considered to be moderate-income in Stockton if its combined income is between $62,201 and $102,000 for the year 2022.
- Above Moderate-Income Household is one that whose combined income is above 120 percent of the AMI. A household of four is considered to be above moderate-income in Stockton if its combined income exceeds $102,001 for the year 2022.

Table HE-25: HCD Household Income Limits

San Joaquin County, 2022

INCOME CATEGORIES	PERSONS PER HOUSEHOLD				
	1	2	3	4	5
Acutely Low (>30%)	*$8,950*	*$10,200*	*$11,500*	*$12,750*	*$13,750*
Extremely Low-Income (30%)	*$17,400*	*$19,900*	*$23,030*	*$27,750*	*$32,470*
Very Low-Income (50%)	*$29,000*	*$33,150*	*$37,300*	*$41,400*	*$44,750*
Low-Income (80%)	*$46,350*	*$53,000*	*$59,600*	*$66,200*	*$71,500*
Median-Income (100%)	*$59,500*	*$68,000*	*$76,500*	*$85,000*	*$91,800*
Moderate-Income (120%)	*$71,400*	*$81,600*	*$91,800*	*$102,000*	*$110,150*

Source: HCD Memorandum: May 13, 2022, https://www.hcd.ca.gov/docs/grants-and-funding/inc2k22.pdf

[2] Health and Safety Code Section 50052.5 establishes affordable housing cost, and Section 50053 establishes affordable rents.

Table HE-26 shows the 2022 HCD-defined household income limits for extremely low-, very low-, low-, and moderate-income households in the Stockton MSA by the number of persons in the household. It also shows maximum affordable monthly rents and maximum affordable purchase prices for homes. For example, a three-person household was classified as low-income (80 percent of median) with an annual income of up to $59,600 in 2022. A household with this income could afford to pay a monthly gross rent (not including utilities) of up to $1,490 or could afford to purchase a house priced at or below $243,455.

Table HE-26: Ability to Pay for Housing based on HCD Income Limits[1]

San Joaquin County, 2022

NUMBER OF PERSONS	1	2	3	4	5
Extremely Low-Income Households at 30% of 2022 Area Median Income					
Income Level	$17,400	$19,900	$23,030	$27,750	$32,470
Max. Monthly Gross Rent [2]	$435	$498	$576	$694	$812
Max. Purchase Price [3]	$71,076	$81,288	$94,073	$113,354	$132,634
Very Low-Income Households at 50% of 2022 Area Median Income					
Income Level	$29,000	$33,150	$37,300	$41,400	$44,750
Max. Monthly Gross Rent [2]	$725	$829	$933	$1,035	$1,119
Max. Purchase Price [3]	$118,460	$135,412	$152,364	$169,111	$182,795
Low-Income Households at 80% of 2022 Area Median Income					
Income Level	$46,350	$53,000	$59,600	$66,200	$71,500
Max. Monthly Gross Rent [2]	$1,159	$1,325	$1,490	$1,655	$1,788
Max. Purchase Price [3]	$189,331	$216,495	$243,455	$270,415	$292,064
Median-Income Households at 100% of 2022 Area Median Income					
Income Level	$59,500	$68,000	$76,500	$85,000	$91,800
Max. Monthly Gross Rent [2]	$1,488	$1,700	$1,913	$2,125	$2,295
Max. Purchase Price [3]	$243,046	$277,767	$312,488	$347,209	$374,986
Moderate-Income Households at 120% of 2022 Area Median Income					
Income Level	$71,400	$81,600	$91,800	$102,000	$110,150
Max. Monthly Gross Rent [2]	$1,785	$2,040	$2,295	$2,550	$2,754
Max. Purchase Price [3]	$291,656	$333,321	$374,986	$416,651	$449,942

[1] Incomes based on HCD's 2022 San Joaquin County Median Family Income for four persons: $85,000.
[2] Assumes that 30 percent of income is available for either: monthly rent, including utilities; or mortgage payment, taxes, mortgage insurance, and homeowners' insurance.
[3] Affordability estimates do not include utility costs.
Notes: Total affordable mortgage based on a 5 percent down payment, an annual 6.25 percent interest rate, 30-year mortgage, and monthly payment equal to 30 percent of income.
Source: HCD Memorandum: May 13, 2022, https://www.hcd.ca.gov/docs/grants-and-funding/inc2k22.pdf

Table HE-27 shows HUD-defined fair market rent levels (FMR) for the Stockton MSA for 2022. In general, the FMR for an area is the amount that would be needed to pay the gross rent (shelter rent plus utilities) of privately owned, decent, safe, and sanitary rental housing of a modest (non-luxury) nature with suitable amenities. FMRs are housing market-wide estimates of rents that provide opportunities to rent standard quality housing throughout the geographic area in which rental housing units are in competition. The rents are drawn from the distribution of rents of all units that are occupied by recent movers. Adjustments are made to exclude public housing units, newly built units, and substandard units.

HUD uses FMRs for a variety of purposes: FMRs determine the eligibility of rental housing units for the Section 8 Housing Assistance Payments program; Section 8 Rental Certificate program participants cannot rent

units whose rents exceed the FMRs; and FMRs also serve as the payment standard used to calculate subsidies under the Rental Voucher program.

Comparing the current FMR levels to Table HE-27, a three-person household classified as low-income (between 51 and 80 percent of median) with an annual income of up to $59,600 could afford to pay $1,490 monthly gross rent (not including utilities). The 2022 FMR for a two-bedroom unit is $1,137 which is affordable to the household, assuming such a unit was available in Stockton. However, a three-person very low-income household ($37,300) could afford to pay only $933, which is below the 2022 FMR amount.

Since the FMR levels apply to the entire Stockton MSA (i.e., San Joaquin County) residents of communities with higher rental rates are likely to find that there is a limited supply of rental units at the regional FMR levels. The lack of affordability would be even worse for the very low-income household mentioned previously if the household has to spend more than the FMR amount to rent a unit in Stockton.

Table HE-27: HUD Fair Market Rent
Stockton MSA, 2022

BEDROOMS IN UNIT	2020 FMR
Studio	$899
1 Bedroom	$904
2 Bedrooms	$1,137
3 Bedrooms	$1,607
4 Bedrooms	$1,847

Source: U.S Department of Housing and Urban Development (HUD) User Data: 2022 FY FMR Geography Summary for San Joaquin County, California, 2022

Housing Values and Median Sales Price

Table HE-28 shows the median home values according to 2016-2020 ACS, adjusted for inflation. The median home value in Stockton was lower than the county and state. The median home value in Stockton was 81.1 percent of the San Joaquin County median home value, and 55.4 percent of the state median home value.

Table HE-29 shows the median home value in Stockton in 1980, 1990, 2000, 2010, and 2020. The median home value in Stockton increased most dramatically between 1980 and 1990 (92.3 percent and between 2000 and 2010 (135.4 percent). In contrast, median home value grew more slowly between 1990 and 2000 (10.1 percent) and between 2010 and 2020 (7.8 percent).

According to Redfin, as of November 2022, the median sales price in Stockton was $420,000 for all home types.

Rental Costs

Table HE-30 contains data on an apartment rental survey conducted in October 2022 provided by Zillow. The average rent for a three-bedroom, the most common unit size in Stockton according to the rent survey, requires an annual household income of approximately $102,000 to cover the $2,357 monthly rent. Based on the HCD income limits, the average apartment is affordable to a moderate-income household of four or five persons (120 percent of the AMI).

Table HE-28: Median Home Value

	CITY OF STOCKTON	SAN JOAQUIN COUNTY	CITY % OF COUNTY	CALIFORNIA	CITY % OF STATE
Median Value (Dollars)	$298,200	$367,900	81.1%	$538,500	55.4%

Source: U.S. Census Bureau, ACS 2016-2020 (5-year Estimates), Table B25077

Table HE-29: Median Housing Value Over Time (Owner-Occupied)

	1980	1990	2000	2010	2020
Median Value (Dollars) of Owner Occupied Homes	$55,500	$106,700	$117,500	$276,600	$298,200
Percentage Change		92.3%	10.1%	135.4%	7.8%

Source: U.S. Census Bureau, Census 1980(ORG STF1), 1990(STF3), 2000(SF3); ACS 2006-2010, 2016-2020 (5-year Estimates), Table B25077

Additionally, Zillow provides data on average median rent for all home types. According to Zillow, the median rent for apartments and condos in the rental market in Stockton is $1,483 with 97 available rentals as of October 12, 2022. The price range for apartments is between $1, 850 and $2,437. Stockton's median rent was 26.0 percent lower than the median rent in the neighboring city of Lodi. The data demonstrates that Stockton may have units affordable to lower-income households; however, may need more rental housing, particularly housing affordable to extremely low-income and very low-income households.

Table HE-30: Average Rental Rates
Stockton, October 2022

UNIT SIZE	2022
Studio	*$1,183*
1-Bedroom	*$1,338*
2-Bedroom	*$1,615*
3-Bedroom	*$2,357*
4- Bedroom	*$2,624*
Average	***$1,823***

Source: Zillow, October 2022.

SPECIAL HOUSING NEEDS

Within the general population of Stockton, there are several groups of people who have special housing needs. These needs can make it difficult for members of these groups to locate suitable housing. The following subsections discuss the special housing needs of six groups identified in State housing element law: the elderly; persons with disabilities, including developmental disabilities; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. In addition to these six groups, the section also discusses the housing needs of extremely low-income households and persons living with AIDS and related diseases. Where possible, estimates of the population or number of households in Stockton belonging to each group are shown.

SENIOR HOUSEHOLDS

Seniors are defined as persons 65 years and older, while senior households are those households headed by a person 65 years and older. Seniors often face unique housing problems. While many may own their homes outright, fixed retirement incomes may not always be adequate to cover rising utility rates and insurance. Also, many elderly homeowners do not have sufficient savings to finance the necessary repair costs. This is a situation commonly described as "house-rich and cash-poor."

Table HE-31 shows information on the number of seniors, the number of senior households, and senior households by housing tenure in Stockton, San Joaquin County, and California in 2020. Seniors represented 6.6 percent of the population in Stockton in 2020, compared to 6.9 percent of the population countywide, and 8.1 percent of the population in California. Because of smaller household sizes, senior households as a percentage of all households, is higher. Senior households represented 21.6 percent of all households in Stockton, 22.5 percent countywide, and 24.4 percent in California. Senior households have a high homeownership rate; 68.0 percent of senior households in Stockton, 74.4 percent of senior households in San Joaquin County, and 73.2 percent of senior households in California were owner-occupied in 2020. Senior households represented 29.5 percent of all owner-occupied households in Stockton and 13.8 percent of all renter households.

While some seniors may prefer to live in single-family detached homes, others desire a smaller, more affordable home with less upkeep, such as condos, townhouses, apartments, or mobile homes. In general, most senior households consist of a single elderly person living alone, or a couple. Housing developments for senior households should contain greater proportions of smaller housing units than projects intended for the general population.

Some seniors have the physical and financial ability to continue driving well into their retirement; however, those who cannot or choose not to drive must rely on alternative forms of transportation. This includes not only bus routes, rail lines, and ride-sharing programs, but also safe, walkable neighborhoods. To accommodate transit access in senior housing, it must be located near transit centers, and in neighborhoods that cater to pedestrians by providing well-lit, wide, shaded sidewalks, clearly marked crosswalks, and longer walk signals at intersections.

Table HE-31: Senior Populations and Households

Stockton, San Joaquin County, and California, 2020

	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Population						
TOTAL POPULATION	**311,103**	-	**751,615**	-	**39,346,023**	-
Total Persons 65 years and older	20,606	6.6%	51,927	6.9%	3,198,850	8.1%
Households						
TOTAL HOUSEHOLDS	**95,236**	**100.0%**	**231,092**	**100.0%**	**13,103,114**	**100.0%**
Owner	47,481	49.9%	133,381	57.7%	7,241,318	55.3%
Renter	47,755	50.1%	97,711	42.3%	5,861,796	44.7%
Senior-Headed Households	20,606	100.0%	51,927	100.0%	3,198,850	100.0%
Owner	14,012	68.0%	38,627	74.4%	2,340,689	73.2%
Renter	6,594	32.0%	13,300	25.6%	858,161	26.8%
Seniors as % of all Households	-	21.6%	-	22.5%	-	24.4%
% of Owner households headed by a senior	-	29.5%	-	29.0%	-	32.3%
% of Renter households headed by a senior	-	13.8%	-	13.6%	-	14.6%

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

As shown in Table HE-32, senior households tend to have lower incomes, as compared with all households throughout California, including in San Joaquin County and Stockton. Senior households earning less than $25,000 comprise 29.6 percent of all households in Stockton, 26.3 percent of all households countywide, and 24.0 percent of all households statewide.

Table HE-32: Senior Household Income Distribution

Stockton, San Joaquin County, and California, 2020

INCOME	STOCKTON				SAN JOAQUIN COUNTY				CALIFORNIA			
	SENIOR HOUSEHOLDS		ALL HOUSEHOLDS		SENIOR HOUSEHOLDS		ALL HOUSEHOLDS		SENIOR HOUSEHOLDS		ALL HOUSEHOLDS	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Less than $25,000	6,102	29.6%	19,539	20.5%	13,667	26.3%	38,609	16.7%	767,317	24.0%	2,031,760	15.5%
$25,000-$39,999	3,259	15.8%	13,928	14.6%	7,516	14.5%	28,083	12.2%	436,153	13.6%	1,369,810	10.5%
$40,000-$59,999	3,133	15.2%	15,467	16.2%	8,868	17.1%	34,620	15.0%	456,669	14.3%	1,720,812	13.1%
$60,000-$99,999	3,947	19.2%	21,835	22.9%	10,525	20.3%	53,415	23.1%	635,254	19.9%	2,779,019	21.2%
$100,000 or more	4,165	20.2%	24,467	25.7%	11,351	21.9%	76,365	33.0%	903,457	28.2%	5,201,713	39.7%
Total	**20,606**	**100.0%**	**95,236**	**100%**	**51,927**	**100.0%**	**231,092**	**100%**	**3,198,850**	**100.0%**	**13,103,114**	**100%**

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B19037

PERSONS WITH DISABILITIES

Table HE-33 shows information from the 2020 ACS 5-Year Estimates (2016-2020) on the disability status and types of disabilities by age group for persons five years and older in Stockton, San Joaquin County, and California. As shown in the table, 14.6 percent of the total population in Stockton five years and older had one or more disabilities in 2020, compared 13.3 percent countywide, and 8.0 percent in California. In terms of the three age groups shown in the table, 5.3 percent of the city's population 5 to 17 years of age, 12.5 percent of the population 18 to 64 years of age, and 40.7 percent of seniors (65 years and older) had one or more disabilities in 2020. The percentage of individuals with a disability is higher for all three age groups in Stockton compared to San Joaquin County and California.

Table HE-33 also provides information on the nature of these disabilities. The total number of disabilities shown for all age groups in Stockton (85,544) exceeds the number of persons with disabilities (41,707) because a person can have more than one disability. Among school-age children, the most frequent disability was cognitive (48.6 percent). For persons ages 18 to 64 years, the most frequent disabilities were ambulatory (27.4 percent), cognitive (23.2 percent), and independent living (20.8 percent). Finally, for seniors, ambulatory and independent living disabilities were the most frequent (29.2 and 21.6 percent, respectively).

Table HE-33: Disability Status and Types of Disabilities by Age Group, Persons Five Years and Older

Stockton, San Joaquin County, and California, 2020

	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Population 5 to 17 years						
Persons age 5 to 17 years	63,462	-	150,947	-	6,534,036	
Persons age 5 to 17 years with a disability	3,377	5.3%	6,768	4.5%	289,883	4.4%
Total disabilities tallied	**4,628**	**100.00%**	**9,008**	**100.0%**	**407,003**	**100.0%**
Hearing	343	7.4%	582	6.5%	33,872	8.3%
Vision	555	12.0%	925	10.3%	51,363	12.6%
Cognitive	2,250	48.6%	4,823	53.5%	215,338	52.9%
Ambulatory	597	12.9%	1,024	11.4%	35,249	8.7%
Self-Care	883	19.1%	1,654	18.4%	71,181	17.5%
Population 18 to 64 years						
Persons age 18 to 64 years	185,547	-	444,781	-	27,586,271	
Persons age 18 to 64 years with a disability	23,155	12.5%	48,181	10.8%	1,944,580	7.0%
Total disabilities tallied	**44,809**	**100.0%**	**90,284**	**100.0%**	**3,525,445**	**100.0%**
Hearing	3,348	7.5%	8,351	9.2%	356,388	10.1%
Vision	4,879	10.9%	9,751	10.8%	374,002	10.6%
Cognitive	10,398	23.2%	20,549	22.8%	844,846	24.0%
Ambulatory	12,287	27.4%	23,972	26.6%	855,712	24.3%
Self-Care	4,581	10.2%	8,956	9.9%	360,887	10.2%
Independent Living	9,316	20.8%	18,705	20.7%	733,610	20.8%

	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Population 65 years and over						
Persons 65 years and over	37,277	-	92,839	-	5,548,424	-
Persons 65 years and over with a disability	15,175	40.7%	36,490	39.3%	920,600	16.6%
Total disabilities tallied	**36,107**	**100.0%**	**82,261**	**100.0%**	**4,294,971**	**100.0%**
Hearing	5,663	15.7%	14,391	17.5%	744,976	17.3%
Vision	3,235	9.0%	6,628	8.1%	343,295	8.0%
Cognitive	4,899	13.6%	9,967	12.1%	525,785	12.2%
Ambulatory	10,558	29.2%	25,007	30.4%	1,227,804	28.6%
Self-Care	3,943	10.9%	9,289	11.3%	532,511	12.4%
Independent Living	7,809	21.6%	16,979	20.6%	920,600	21.4%
Total Population 5 years and over						
Persons 5 years and over	286,286	-	688,567	-	39,668,731	-
Persons 5 years and over with a disability	41,707	14.6%	91,439	13.3%	3,155,063	8.0%
Total disabilities tallied	**85,544**	**100.0%**	**181,553**	**100.9%**	**8,298,600**	**100.0%**
Hearing	9,354	10.9%	23,324	12.8%	1,135,236	13.7%
Vision	8,669	10.1%	17,304	9.5%	768,660	9.3%
Cognitive	17,547	20.5%	35,339	19.5%	1,585,969	19.1%
Ambulatory	23,442	27.4%	50,003	27.5%	2,118,765	25.5%
Self-Care	9,407	11.0%	19,899	11.0%	964,579	11.6%
Independent Living	17,125	20.0%	37,338	20.6%	1,725,391	20.8%

Source: U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020).

Persons with disabilities in Stockton have different housing needs depending on the nature and severity of the disability. Physically disabled persons generally require modifications to their homes such as wheelchair ramps, elevators, wide doorways, and modified fixtures and appliances. If a disability prevents a person from driving, then access to public transportation is particularly important. If a disability prevents an individual from working or limits income, then the cost of housing and the costs of modifications are likely to be even more challenging. Those individuals with severe physical or mental disabilities may also require supportive housing, nursing facilities, or care facilities. In addition, many persons with disabilities rely solely on Social Security Income, which is insufficient for market-rate housing.

The City of Stockton has adopted the 2022 California Existing Building Code, including Title 24 regulations dealing with accessibility for persons with disabilities. Newer housing shall meet minimum standards for access for persons with disabilities. One of the key needs for persons with disabilities is assistance in retrofitting older homes.

Persons with Developmental Disabilities

According to Section 4512 of the Welfare and Institutions Code, "developmental disability" means a disability that originates before an individual attains 18 years of age, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. It includes intellectual disabilities, cerebral palsy, epilepsy, and autism. This term also includes disabling conditions found to be closely related to intellectual disability or to require treatment similar to that required for individuals with intellectual disabilities but does not include other conditions that are solely physical in nature. Many developmentally disabled persons can live and work independently within a conventional housing

environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult. As described above, people living with a developmental disability can live in various types of housing, and often face a lack of truly integrated, community-based options. Such options include:

- Rent-subsidized affordable housing, with services if necessary, accessible, close to transit and community.
- Housing Choice Voucher with housing navigation supports. Few regional centers contract with housing navigators – but people with specialized training to help place individuals in housing can be critical.

Overall, individuals with developmental disabilities should have choice to live in the most integrated, non-segregated settings possible. While substantially less preferable, the following may also be appropriate: Licensed and unlicensed modified single Family homes or housing specially modified for the medically fragile (SB 962 Homes).

According to the California Department of Developmental Services, as of April 2022, the Valley Mountain Regional Center served 16,443 residents with developmental disabilities in the region and 5,387 residents in Stockton. Of the total in the region, 54.7 percent of disabled persons are under the age of 18, and 45.3 percent are 18 or older (Table HE-34). A significant number of developmentally disabled Stockton residents receiving services from the Valley Mountain Regional Center lived in group home facilities (10.2 percent of adults). Most developmentally disabled individuals lived at home (76.8 percent). Many developmentally disabled persons are able to live and work independently. However, more severely disabled individuals require a group living environment with supervision, or an institutional environment with medical attention and physical therapy. Because developmental disabilities exist before adulthood, the first housing issue for the developmentally disabled is the transition from living with a parent/guardian as a child to an appropriate level of independence as an adult.

Table HE-34: Developmental Disability by Age Group

Stockton[1], April 2022

AGE GROUP	NUMBER	PERCENTAGE
00-17 years	*2,946*	*54.7%*
18 years	*2441*	*45.3%*
Total	***5,387***	***100.00%***

Source: California Department of Developmental Services, April 2022.

LARGE FAMILIES/HOUSEHOLDS

HUD defines a large household or family as consisting of five or more members. The most critical housing need of large families is access to larger housing units with more bedrooms than a standard two- or three-bedroom dwelling. Multifamily rental housing units typically provide one or two bedrooms and not the three or more bedrooms that are required by large families. As a result, the large families that are unable to rent single-family homes may be overcrowded in smaller units. In general, housing for families should provide safe outdoor play areas for children and should be located to provide convenient access to schools and childcare facilities.

Table HE-35 shows the number and share of large households in Stockton, San Joaquin County, and California in 2020. As shown in the table, 20.5 percent of all households in Stockton had five or more persons. Large households made up 20.5 percent of all owner-occupied households and 21.8 percent of all renter households in Stockton in 2020. The percentage of large households among all households in Stockton was larger than the percentages countywide (19.6 percent) and in California (13.8 percent).

Table HE-35: Large Households
Stockton, San Joaquin County, and California, 2020

	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT
Owner-Occupied						
Less than 5 Persons	37,768	79.5%	108,541	81.4%	6,239,598	86.2%
5+ Persons	9,713	20.5%	24,840	18.6%	1,001,720	13.8%
TOTAL	**47,481**	**100.0%**	**133,381**	**100.0%**	**7,241,318**	**100.0%**
Renter-Occupied						
Less than 5 Persons	37,323	78.2%	77,230	79.0%	5,053,998	86.2%
5+ Persons	10,432	21.8%	20,481	21.0%	807,798	13.8%
TOTAL	**47,755**	**100.0%**	**97,711**	**100.0%**	**5,861,796**	**100.0%**
All Households						
Less than 5 Persons	75,091	78.8%	185,771	80.4%	100.0%	86.2%
5+ Persons	20,145	21.2%	45,321	19.6%	1,809,518	13.8%
TOTAL	**95,236**	**100.0%**	**231,092**	**100.0%**	**13,103,114**	

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

FEMALE-HEADED HOUSEHOLDS

Table HE-36 compares the number of female-headed households with children and poverty rates in Stockton, San Joaquin County, and California in 2020. Stockton has a greater proportion of single female-headed households with children under the age of 18 (8.1 percent of all households) compared to countywide (5.8 percent) and statewide (4.7 percent). Among all households below the poverty level, female-headed households account for a greater proportion in Stockton (28.9 percent) in comparison to San Joaquin County as a whole (25.6 percent) and California (21.5 percent).

Table HE-36: Female-Headed Households
Stockton, San Joaquin County, and California, 2020

	STOCKTON		SAN JOAQUIN COUNTY		CALIFORNIA	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Householder Type						
Total Households	**95,236**	**100.00%**	**231,092**	**100.00%**	**13,103,114**	**100.00%**
Female-Headed Households	28,814	30.3%	58,087	25.14%	3,430,426	26.2%
Female-Headed Households with Children <18 Years	7,715	8.1%	13,427	5.8%	615,734	4.7%
Poverty Status						
Total Households Below Poverty Level	**9,432**	**13.7%**	**18,652**	**10.8%**	**806,599**	**9.0%**
Female-Headed Households Below Poverty Level	5,239	28.9%	8,916	25.6%	364,236	21.5%

Source: Stockton Data Packet, 2022 -- U.S. Census Bureau, American Community Survey 5-Year Estimates (2016-2020)

Female-headed households generally have lower incomes because there is only one potential wage earner. Individuals in this special-needs group often have more difficulties finding adequate, affordable housing than families with two adults. Female-headed households with small children may need to pay for childcare, which further reduces disposable income. This special-needs group will benefit generally from expanded affordable housing opportunities. More specifically, the need for dependent care also makes it important that housing for single-headed families be located near childcare facilities, schools, youth services, and medical facilities.

FARMWORKERS

Farmworkers are an essential component of Stockton's economy. Determining the number of farmworkers in a region is difficult due to the variability of the definitions used by government agencies and other characteristics of the farming industry, such seasonal workers who migrate from place to place. The 2016-2020 ACS estimates that 5,010 residents within the City of Stockton work in agriculture, forestry, fishing and hunting, or mining. A source of information on the number of families with school-age children is the San Joaquin County Office of Education (SJOE). According to the SJOE Department of Migrant Education, as of 2023, there are 885 migrant students in Stockton. However, not all farmworkers in Stockton have school-age children, and not all school-age children from migrant farmworker families are enrolled in the migrant education program.

Another source is the U.S. Census of Agriculture, which is conducted every five years and gives the most recent estimate on the number and type of farmworkers in San Joaquin County. The most recent U.S. Census of Agriculture data is from 2017. The Census has shown changes in the farmworker population over time. In 2012, 24,872 farmworkers were employed in the county. In 2017, 19,741 farmworkers worked in San Joaquin County, which is a significant decrease from 2012. The Agriculture census counted 1,707 farms countywide. Countywide, as of 2017 the majority of farmworkers were seasonal, with 59.5 percent of farmworkers working less than 150 days per year. The remaining 40.5 percent were permanent farmworkers that worked 150 or more days each year. Housing conditions for migrant farmworkers are substantially different from the housing conditions of permanent residents employed full-time or part-time in agriculture. Since migrant farmworkers frequently move locations, they are typically renters. The Community and Labor Center at UC Merced published a report in 2022 titled "Farmworker Health in California" (FWHS). Several farmworker affiliated organizations across Central California participated in this survey. According to the report, 92 percent of the participants rented and resided in single-family homes (55 percent) and about one third of participants lived in apartments (31 percent).

Additionally, migrant farmworkers earn a low income. This forces the farmworking community to compete for the lowest-cost housing, which is typically substandard. According to the FWHS report, farmworkers generally experience substandard housing that often require repairs or suffer from poor ventilation in older homes, apartments, mobile homes, motels, garages and other similar spaces, that put farmworkers at higher risk for respiratory illnesses. The report also discusses that 24 percent of surveyed farmworkers reported very bad "poor taste of water" and 13 percent reported "bad" taste of water. Additionally, 1 out of three farmworkers experienced difficulty keeping their home cool or warm. Lastly, more than 10 percent of surveyed farmworkers encountered mold, water damage and water leaks. Most rental units available to migrant farmworkers are small; however, most farmworking families are above average in size. To afford the high rents that result from low vacancy rates, particularly at the height of the migrant worker season in the county, migrant workers often share rooms and housing units. Surveyed farmworkers reported living in overcrowded households with one fourth of respondents (29 percent) reporting six or more persons per unit and more than half (55 percent) reporting two persons (including themselves) slept in their room. As a result, substandard housing, affordability and overcrowding are critical issues among this special-needs group. The San Joaquin County Housing Element contains numerous policies and programs to address the needs of farmworkers. A major policy approach in San Joaquin County is to encourage farmworker housing in the unincorporated county's agricultural zones. This reduces farmworkers' commute times, decreases transportation expenses, and provides more affordable housing options. While the City supports the efforts to provide farmworker housing, it is primarily the County's role to provide this housing. The City has included

Program 28 to continue to work with the County and via Program 17 will ensure the Development Code is up to date to allow employee housing including housing for farmworkers consistent with State law. In addition, Programs 11, 12, 16, 22, 23, and 30 commit to other actions to support developing new homes and rehabilitating existing homes for farmworkers, along with prioritizing outreach and programs for farmworkers.

The decline in grower-provided worker shelter resulted in the State government directing resources to farmworker housing through State-owned and local government-operated migrant labor camps. The Housing Authority of San Joaquin County operates three of these State-owned migrant camps totaling 220 units. This housing is available annually from May through the end of October. Day care centers are provided for farmworkers, as well as services from the Employment Development Department, the Social Security Administration, and education and health care services. During the off-season, one of the migrant camps in French Camp is also used as a cold weather overflow homeless shelter for families (from mid-December through mid-March).

PERSONS IN NEED OF EMERGENCY SHELTER

Homelessness is a continuing concern in California. Most families become homeless because they are unable to afford housing in a particular community. Nationwide, about half of those experiencing homelessness over the course of a year are single adults. Most enter and exit the system fairly quickly. The remainder essentially lives in the homeless assistance system, or in a combination of shelters, hospitals, on the streets, or in jails and prisons. There are also single homeless people who are not adults, including runaway and "throwaway" youth (children whose parents will not allow them to live at home).

The housing needs of homeless persons are more difficult to measure and assess than those of other population subgroups. Since these individuals have no permanent address, they are not likely to be counted in the Census.

The most recent information available on homeless individuals is a "point-in-time" (PIT) count that was conducted by the San Joaquin County Community Development Department and the Central Valley Low Income Housing Corporation in late January 2022 (Table HE-37). The PIT count was conducted in the cities of Stockton, Tracy, Lodi, and Manteca because the majority of homeless services are provided in these larger cities.

The 2022 PIT count reports a total of 2,319 individuals experiencing homelessness in San Joaquin County – about an 18.0 percent increase from the 2015 PIT count. While the results suggest there has been an increase in the number of unsheltered homeless, the increase may also be a result of a more complete and rigorous unsheltered count. Of the total 2,319 individuals, 41.6 percent were sheltered, while 58.4 percent (1,355 persons) were unsheltered. Data collected for City of Stockton was more limited (only unsheltered persons were surveyed) but did include the figure for unsheltered individuals of 893 persons. In Stockton, a majority of the unsheltered persons were Caucasian (63%) with the second largest ethnic group of Black or African-American (25.5%). Most people had been homeless for one year or more (83%) and Stockton was the location they were first homeless (82%). Countywide, among the total homeless persons counted, 38.4 percent were unsheltered males and 19.8 percent were unsheltered females. The majority of persons counted were Caucasian (63.1 percent) and 24 years or older (81.7 percent). A total of 329 persons ages 18 years or younger were counted (14.2 percent). Adults with serious mental illness accounted for 24.5 percent of the total homeless persons counted. Chronically homeless persons made up 34.9 percent of the total. These figures demonstrate the typical demographics of a homeless individual in San Joaquin County is a single, Caucasian male age 24 years or older. The City relied on the Stockton Local Homelessness Action Plan (LHAP) and the region's San Joaquin Continuum of Care (CoC) for data which rely on the Point in Time (PIT) metric based on U.S. Department of Housing and Urban Development (HUD) criteria for funding. Staff also contacted the following local homeless experts for what metric they use to calculate the homeless population in Stockton and the region.

- Melanie Estarziau, Stockton's Homeless Strategic Initiatives Manager

- Jon Mendelson, Executive Director Central Valley Low Income Housing Corporation (Local Homeless Provider)

While each representative indicated the 2022 PIT metric has some faults and that there are lots of different ways to calculate homeless populations (sheltered/unsheltered and city/county), they agreed that the 2022 PIT number represented in the Housing Element was accurate with what their data shows for unsheltered homeless population in Stockton in a day. They both indicated there are lots of data sources and metrics in the area so it would not be difficult to select a different metric that would conflict with another.

Table HE-37: Homeless Population Survey

	SHELTERED		UNSHELTERED		TOTAL	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
City of Stockton						
Total Persons	Data not collected		893	-	893	-
Gender						
Female	Data not collected		-	35%	-	35%
Male	Data not collected		-	65%	-	65%
Gender Non-Conforming (i.e., not exclusively male or female)	Data not collected		-	0%	-	0%
Ethnicity						
Hispanic/Latino	Data not collected		-	31%	-	31%
Non-Hispanic/Latino	Data not collected		-	69%	-	69%
Race						
Caucasian	Data not collected		-	63%	-	63%
Black or African-American	Data not collected		-	25.5%	-	25.5%
Asian	Data not collected		-	3%	-	3%
American Indian or Alaska Native	Data not collected		-	2%	-	2%
Native Hawaiian or Other Pacific Islander	Data not collected		-	0.5%	-	0.5%
Multiple Races	Data not collected		-	6%	-	6%
Specified Age Groups						
18 to 24 years	Data not collected		-	2%	-	2%
Age 62 or older	Data not collected		-	10%	-	10%
Family Type/Other						
Substance Use Issue	Data not collected		-	33%	-	33%
Mental Health Issue	Data not collected		-	36%	-	36%
Veteran	Data not collected		-	6%	-	6%
Pet Owner	Data not collected		-	44%	-	44%
Medical Insurance	Data not collected		-	73%	-	73%
Income						
Cash Income	Data not collected		-	39%	-	39%
Non-Cash Benefits	Data not collected		-	53%	-	53%
Length of Time Homeless						
Less than 3 months	Data not collected		-	6%	-	6%
Less than 6 months	Data not collected		-	4%	-	4%
Less than a year	Data not collected		-	6%	-	6%

	SHELTERED		UNSHELTERED		TOTAL	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
One year or more	Data not collected		-	83%	-	83%
Chronically Homeless	Data not collected		-	49%	-	49%
Location First Homeless						
This community	Data not collected		-	82%	-	82%
Other in San Joaquin County	Data not collected		-	5%	-	5%
Outside San Joaquin County	Data not collected		-	13%	-	13%
San Joaquin County						
Total Households and Persons						
Total Households	637	32.0%	1,355	68.0%	1,992	100.0%
TOTAL PERSONS	**964**	**41.6%**	**1,355**	**58.4%**	**2,319**	**100.0%**
Gender						
Female	432	18.6%	459	19.8%	891	38.4%
Male	530	22.9%	891	38.4%	1,421	61.3%
Gender Non-Conforming (i.e., not exclusively male or female)	1	0.0%	0	0.0%	0	0.1%
Ethnicity						
Hispanic/Latino	315	13.6%	411	17.7%	726	31.3%
Non- Hispanic/Latino	649	28.0%	944	40.7%	1,593	68.7%
Race						
Caucasian	533	23.0%	930	40.1%	1,463	63.1%
Black or African-American	248	10.7%	271	11.7%	519	22.4%
Asian	31	1.3%	35	1.5%	66	2.8%
American Indian or Alaska Native	26	1.1%	23	1.0%	49	2.1%
Native Hawaiian or Other Pacific Islander	19	0.8%	7	0.3%	26	1.1%
Multiple Races	107	4.6%	89	3.8%	196	8.5%
Age						
18 years or younger	328	14.1%	1	0.0%	329	14.2%
18 to 24 years	64	2.8%	32	1.4%	96	4.1%
24 years and older	572	24.7%	1,322	57.0%	1,894	81.7%
Family Type						
Persons in households with at least one adult and one child	487	21.0%	0	0.00%	487	21.0%
Persons in households with only children	2	0.1%	1	0.04%	3	0.1%
Persons in households without children	475	20.5%	1,354	58.4%	1,829	78.9%
Adults with Serious Mental Illness	118	5.1%	449	19.4%	567	24.5%
Substance Use Disorder	162	7.0%	440	19.0%	602	26.0%
Victims of Domestic Violence	22	0.9%	10	0.4%	32	1.4%
Persons with HIV/AIDS	1	0.0%	9	0.4%	10	0.4%
Veterans	1	0.0%	0	0.0%	1	0.0%
Chronically Homeless	153	6.6%	656	28.3%	809	34.9%

[1] These statistics are self-reported and are typically underreported.

Source: San Joaquin Continuum of Care PIT Count, June 2022.

The City of Stockton participates in the Continuum of Care (CoC), which is a comprehensive, three-fold approach, to meets the needs of the City's homeless. The first tier is emergency shelter and short-term housing, the second tier is transitional housing, and the third tier is permanent affordable housing. To address the problem of homelessness effectively, the City uses a comprehensive approach that combines these shelter and housing facilities with support services to address the needs of each of the sub-populations within the homeless population. Treatment of mental illness and substance abuse, counseling and protection for domestic violence victims, the provision of job training, and intensive case management are critical to reducing homelessness. The goal of a comprehensive homeless service system is to ensure that homeless individuals and families move from homelessness to self-sufficiency, permanent housing, and independent living.

In addition, the City works with San Joaquin County in administering the Shelter Plus Care Program to provide special supportive housing for persons with disabilities and for homeless individuals. City staff meets on a regular basis with staff of other local agencies to identify local issues and discuss appropriate programming of services for homeless persons and those individuals with special needs. The Shelter Plus Care Program is designed to provide housing and supportive services on a long-term basis for homeless persons with disabilities, primarily those with serious mental illnesses, chronic problems with alcohol and/or drugs, AIDS, or related diseases who are living in places not intended for human habitation or in emergency shelters.

Overnight and Emergency Shelters

Table HE-38 summarizes overnight and emergency shelter facilities available in San Joaquin County, including Stockton, the bed capacity, and the characteristics of clients they serve. The majority of facilities serve unaccompanied males and females, adult couples without children, and single-parent and two-parent families. The Women's Center – Youth and Family Services (YFS) Safe House is the only shelter that specifically serves unaccompanied youth under 18. Stockton Shelter for the Homeless (SSH) and Gospel Center Rescue Mission (GCRM) have the greatest capacity at 357 and 240 beds, while the remaining shelters have an average capacity of 30 beds.

Table HE-38: Overnight and Emergency Facilities

San Joaquin County, 2022

FACILITY/PROVIDER	LOCATION	DESCRIPTION
Gospel Center Rescue Mission (GCRM)	*Stockton*	*GCRM operates an emergency shelter for up to 100 homeless men, women, and children. GCRM also operates a Recuperative Care Program (RCP) that provides 24-hour shelter beds for people who are too well to be in the hospital, but too sick to recuperate on the streets. The RCP has up to 50 beds.*
Stockton Shelter for the Homeless (SSH)	*Stockton*	*SSH provides temporary shelter for single adults and families. The shelter can house up to 357 people in its two facilities and HOPW (Housing Opportunities for Persons with Aids) homes. The shelter assists clients in obtaining permanent housing.*
Women's Center - Youth and Family Services, Safe House	*Stockton*	*Safe House offers up to 21 days of shelter and supportive services for runaway, throwaway, and homeless youth ages 12-17. This facility can assist up to 10 youth at a given time plus their children.*
Haven of Peace	*French Camp*	*The Haven of Peace is a two-week shelter for women and their children with the capacity to house 35 individuals, including both adults and children. The shelter offers management, a variety of classes to residents such as life skills, parenting, budgeting, and computer classes. Residents are referred to other agencies for assistance with domestic violence, substance abuse, mental health, and other issues. There is a possibility of extending the stay for up to six months if residents work with their case manager and are reaching goals toward achieving self-sufficiency.*
Hope Family Shelter	*Manteca*	*The Hope Family Shelter can house 8 families. Food, clothing, utilities, and counseling are provided.*
Raymus House (Hope Family Shelter)	*Manteca*	*An emergency shelter that services up to 10 families consisting of women and children who have been displaced for up to 60-90 days. Women may bring their children, girls ages 0-18 and boys 0-12.*
Hope Harbor Shelter	*Lodi*	*Hope Harbor is the largest shelter in Lodi, which can accommodate women with children, men, and single-family units. It is also the only shelter in the area that can house single fathers with children. Clients may stay 56 nights per calendar year with an option for a 28-day extension should they enter into case management.*

FACILITY/PROVIDER	LOCATION	DESCRIPTION
Lodi House	*Lodi*	*Lodi House is a shelter for women and their children. The facility houses approximately seven adults and their children.*
McHenry House	*Tracy*	*The McHenry House provides shelter and meals for single women, women with children, and couples, up to 18 people for a maximum stay of 15 days. The shelter typically serves seven families at a time.*
Women's Center - Family and Youth Services, Serenity House	*Tracy*	*Serenity House is an emergency shelter for battered women and their children. Serenity House offers a comprehensive 60-day program with the capacity to serve up to 12 women and their children at a given time.*

Source: PlaceWorks; contacted agency or facility, October 2022.

Transitional Housing

For many, transitional housing, long-term rental assistance, and/or greater availability of low-income rental units are also needed. Transitional housing is usually in buildings configured as rental housing developments but operate with State programs that require the unit to be cycled to other eligible program recipients after some predetermined amount of time. Supportive housing has no limit on length of stay and is linked to on-site or off-site services that assist the resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live well and work in the community.

Transitional housing programs provide extended shelter and supportive services for homeless individuals and/or families with the goal of helping them live independently and transition into permanent housing. Some programs require that the individual/family transition from a short-term emergency shelter. The length of stay varies considerably by program but is generally longer than two weeks and can last up to 60 days or more. In many cases, transitional housing programs will provide services for up to two years or more. The supportive services may be provided directly by the organization managing the housing or by other public or private agencies in a coordinated effort with the housing provider. Transitional housing/shelter is generally provided in apartment-style facilities with a higher degree of privacy than short-term homeless shelters, may be provided at no cost to the resident, and may be configured for specialized groups within the homeless population, such as people with substance abuse problems, mental illness, victims of domestic violence, veterans, or those with AIDS/HIV.

There are several transitional or supportive housing programs offered in San Joaquin County, mostly in the city of Stockton. As shown in Table HE-39, transitional and permanent supportive housing programs are being provided by Central Valley Low Income Housing Corporation (CVLIHC), New Directions, Women's Center – Youth and Family Services, Gospel Center Rescue Mission, Dignity's Alcove, Stockton Shelter for the Homeless, Lutheran Social Services, and HOPE Family Shelter.

Table HE-39: Transitional and Permanent Supportive Housing

San Joaquin County, 2022

FACILITY/PROVIDER	LOCATION	DESCRIPTION
Central Valley Low Income Housing Corporation (CVLIHC)	Stockton and various locations throughout the county	CVLIHC provides transitional housing for homeless families with children. CVLIHC operates a scattered site program throughout San Joaquin County with participants having the primary responsibility for the units where they live. The program provides 196 units. CVLIHC also provides permanent supportive housing to homeless individuals with a disability, and preference is given to those who are chronically homeless. Two of the sites can serve both individuals and households with children, and the other two can only serve single adults. Housing sites are scattered throughout San Joaquin County and provide a total of 356 units.
Dignity's Alcove	Stockton	Dignity's Alcove provides 24-month transitional and recovery housing for up to 47 homeless veterans at one time. The comprehensive program includes client assessment, case management, drug and alcohol education, communications training, and more.
Lodi House	Lodi	Lodi House has a transitional housing program for women and their children. The facility houses approximately seven adults and their children.
Gospel Center Rescue Mission (GCRM)	Stockton	GCRM provides the New Life Program (NLP), a residential addiction treatment program for men, women, and families at the Gospel Center Rescue Mission. There is a max capacity of 40 men and 200 women and children.
Lutheran Social Services' Project HOPE	Stockton	Lutheran Social Services' Project HOPE program provides permanent housing and supportive services to homeless emancipated foster youth. The program has capacity for 34 individuals and their children.
New Directions	Stockton	New Directions provides housing and supportive services for homeless adults who have an active substance abuse problem. New Directions has separate programs and facilities for men and women on the same campus. The total capacity is approximately 75 participants. New Directions provides 24 beds.
Stockton Shelter for the Homeless, Holman House	Stockton	Operated by the Stockton Homeless Shelter, the Holman House provides emergency shelter, transitional housing assistance, and supportive services for persons living with HIV/AIDS. Holman House has a max capacity of 10 beds.
Women's Center - Youth and Family Services, DAWN House	Stockton	DAWN House is a shelter for abused women and their children. This facility houses approximately 42 adults and children. The length of stay is normally 30 to 60 days.
Women's Center - Youth and Family Services, Opportunity House Transitional Living Program	Stockton	Opportunity House Transitional Living Program provides up to 21 months of shelter and supportive services to prepare runaway, throwaway, and homeless youth for independent living. The program serves youth ages 18-21 and emancipated youth ages 16-17 years old. The program can assist 8 people at a time.
HOPE Family Shelter	Manteca	Building HOPE provides transitional housing and services to homeless families. The project serves 8 families at a time. The families can live in the facility for up to 2 years while paying a fixed rent at 30 percent of family income and receiving employment assistance.
Town Center Studios	Stockton	Town Center Studios is 40 units of housing for persons who are chronically homeless.

Source: PlaceWorks; contacted agency or facility, October 2022

Summary of Emergency Shelter and Transitional/Permanent Supportive Housing Capacity

Table HE-40 summarizes homeless facilities in Stockton including bed capacity and the characteristics of clients they serve. The majority of facilities serve unaccompanied males and females, adult couples without children, and single-parent and two-parent families. Overall, the Stockton facilities listed in Table HE-40 have the capacity for 1,172 persons at a given time.

Table HE-40: Emergency and Transitional/Permanent Supportive Shelter Provider Capacities

Stockton, 2022

FACILITY NAME	HOMELESS BENEFICIARIES	BED CAPACITY
Berkley Food and Housing Project	Adult Couples with Children Unaccompanied Females Unaccompanied Males Single Parent Families	21
Catholic Charities	-	1
Children's Home	Unaccompanied Male Youth Under 18 Unaccompanied Female Youth Under 18	12
Central Valley Low Income Housing Corporation	Adult Couples without Children Single-Parent Families Two-Parent Families Unaccompanied Females Unaccompanied Males	552[1]
Dignity's Alcove	Unaccompanied Males Unaccompanied Females	22
Gospel Center Rescue Mission	Unaccompanied Males Unaccompanied Females Single-Parent Families	272
Haven of Peace	Unaccompanied Females (with children)	35
Hope Ministries	Unaccompanied Females (with children) Adult Couples without Children	126
Lodi House	Unaccompanied Females (with children)	36
Lutheran Social Services' Project HOPE	Single-Parent Youth Unaccompanied Female Youth Under 18 Unaccompanied Male Youth Under 18	34 (plus their children)
New Directions	Unaccompanied Females Unaccompanied Males	24
Manteca	-	50
Mary Magdalene	Single-Parent Families Adult Couples with Children Unaccompanied Females	11
McHenry House	Single-Parent Families Adult Couples with Children	30
Ready to Work	Unaccompanied Females Unaccompanied Males	48
Salvation Army-Lodi	Single-Parent Families Single-Parent Families Adult Couples with Children	115

FACILITY NAME	HOMELESS BENEFICIARIES	BED CAPACITY
Stockton Shelter for the Homeless	*Unaccompanied Females* *Unaccompanied Males* *Single-Parent Families* *Two-Parent Families* *Adult Couples without Children*	*320*
Stockton Shelter for the Homeless, Holman House	*Unaccompanied Females* *Unaccompanied Males*	*10*
Town Center Studios	*Stockton*	*Town Center Studios is 40 units of housing for persons who are chronically homeless.*
Tracy Community Connection Center	*Unaccompanied Females*	*12*
Women's Center - Youth and Family Services, DAWN House, and Serenity House	*Single-Parent Families* *Unaccompanied Females*	*35*
Women's Center - Youth and Family Services, Safe House	*Unaccompanied Female Youth Under 18* *Unaccompanied Male Youth Under 18* *Single-Parent Youth*	*8 (plus their children)*
WestCare California	*Unaccompanied Females* *Unaccompanied Males*	*16*
Women's Center – Youth and Family Services, Opportunity House Transitional Living Program	*Unaccompanied Females* *Unaccompanied Males* *Unaccompanied Female Youth Under 18* *Unaccompanied Male Youth Under 18*	*16*

Note: 1 Total bed capacity in Stockton is estimated based on roughly 60 percent of CVLIHC's transitional housing units are located at an address with a Stockton zip code. Regarding CVLIHC's permanent supportive housing units, roughly 90 percent of the units have a Stockton zip code.
"(-)" data not available
Source: PlaceWorks; contacted agency or facility, October 2022.

PERSONS DIAGNOSED WITH AIDS AND RELATED DISEASES

According to the California Department of Public Health, as of April 21, 2022, there have been 1,471 reported cases of AIDS since the onset of the disease in the county in the 1980s. Through the Housing Opportunities for Persons with AIDS (HOPWA) program, federal funds are allocated to the State and the County for the purpose of assisting people living with the disease in securing permanent and affordable housing. Through San Joaquin County Public Health Services, Stockton Shelter uses HOPWA funds to purchase and run transitional houses for AIDS-infected persons who are homeless or having financial difficulties. Residents can stay in transitional housing for up to 18 months while they secure a job, home, or SSI benefits. Within the city, Stockton Shelter administers one transitional house, with capacity for 10 individuals, and five condominiums for families of three to four people. In addition to transitional housing, Stockton Shelter also provides emergency assistance for people who cannot afford their housing payments due to a health emergency or high health-care costs.

According to area health care providers, additional housing needs for people with AIDS and HIV include more emergency housing assistance, funding to cover first- and last-month's rent, low-cost housing for individuals such as residential hotels, and assisted living for persons in the middle- to late-stages of the disease.

EXTREMELY LOW-INCOME HOUSEHOLDS

Extremely low-income (ELI) households are defined as those households with incomes under 30 percent of the AMI. Extremely low-income households typically consist of minimum-wage workers, seniors on fixed incomes, disabled individuals, and farmworkers. This income group is likely to live in overcrowded and substandard housing conditions. This group of households has specific housing needs that require greater government subsidies and assistance, housing with supportive services, single-room occupancy (SRO), shared housing, and/or rental subsidies or vouchers. In recent years, rising rents, higher income and credit standards imposed by landlords, and insufficient government assistance has exacerbated the problem. Without adequate assistance, this group has a high risk of homelessness.

In Stockton, a household of three persons with an income of $23,030 in 2022 would qualify as an extremely low-income household. Table HE-41 shows the number of extremely low-income households and their housing cost burden in Stockton, San Joaquin County, and California in 2018. As shown in the table, Stockton had a higher percentage (14.0 percent) of extremely low-income households than countywide (10.3 percent), although slightly less than the state (14.1 percent). Following the statewide and countywide trends, the city had a larger proportion of extremely low-income renter households (21.4 percent) than countywide (16.8 percent) and a slightly smaller proportion than the state (22.5 percent). Stockton had a similar proportion of extremely low-income owner households (5.9 percent) than countywide (5.1 percent) and less than California (7.2 percent). Generally, households that pay more than 30 percent of their income on housing costs are considered to be overpaying for housing or cost burdened, while households that pay 50 percent or more are considered to be severely overpaying or severely cost burdened.

In Stockton, 82.5 percent of extremely low-income households had a moderate housing cost burden (> 30 percent or more) and 73.1 percent had a severe (>50 percent or more) housing cost burden. This was slightly higher than the cost burdens of extremely low-income households in the county and state. Extremely low-income renters in Stockton had a much higher incidence (84.2 percent) of a moderate housing cost burden than owners (75.7 percent) and 74.8 percent of renters had a severe cost burden compared to 66.4 percent of owners. This information suggests that there is a need for affordable rental units for extremely low-income residents in Stockton.

Table HE-41: Housing Cost Burden of Extremely Low-Income Households
Stockton, San Joaquin County, and California, 2018

	STOCKTON			SAN JOAQUIN COUNTY			CALIFORNIA		
	OWNERS	RENTERS	TOTAL	OWNERS	RENTERS	TOTAL	OWNERS	RENTERS	TOTAL
Number of ELI households	**2,650**	**10,695**	**13,345**	**6,455**	**16,950**	**23,405**	**509,410**	**1,324,385**	**1,833,795**
Number of total households	45,230	49,960	95,190	126,095	100,630	226,725	7,085,435	5,880,000	12,965,435
% of total households	5.9%	21.4%	14.0%	5.1%	16.8%	10.3%	7.2%	22.5%	14.1%
Number w/ cost burden > 30%	**2,005**	**9,000**	**11,005**	**4,950**	**13,810**	**18,760**	**380,295**	**1,060,070**	**1,440,365**
% w/ cost burden > 30%	75.7%	84.2%	82.5%	76.7%	81.5%	80.2%	74.7%	80.0%	78.5%
Number w/ severely cost burden > 50%	**1,760**	**8,000**	**9,760**	**4,295**	**12,480**	**16,775**	**316,175**	**913,810**	**1,229,985**
% w/ severely Cost Burden > 50%	66.4%	74.8%	73.1%	66.5%	73.6%	71.7%	62.1%	69.0%	67.1%

Source: Stockton Data Packet, 2022 -CHAS (2014-2018).

PRESERVING AT-RISK UNITS

Over the past several decades, hundreds of thousands of affordable rental housing units have been constructed in California with the assistance of federal, state, and local funding (loans or grants) that restricted rents and occupancy of units to low-income households for specified periods of time. Once these restrictions expire, a property owner may charge market rents. Low-income occupants are often displaced when rents rise to market levels.

State law requires that housing elements include an inventory of all publicly assisted multifamily rental housing facilities within the local jurisdiction and note those that are at risk of conversion to uses other than lower-income residential within 10 years of the beginning of the housing element planning period, which is December 31, 2023, so before December 31, 2033.

California Government Code requires that owners of federally assisted properties provide notice of intent to convert their properties to market rate and provide information and options to tenants. The details about the requirements are included in Program 21.

Table HE-42 shows the assisted housing facilities in Stockton, including those that are considered "at risk." There are four affordable housing facilities with a total of 392 units at risk of conversion before December 31, 2033: Steamboat Landing Apartments, Filipino Center, Villa de San Joaquin, and Inglewood Gardens (Table HE-42).

Table HE-42: Federally Subsidized Rental Facilities At-Risk

Stockton, 2023-2031

FACILITY NAME	ADDRESS	AFFORDABLE UNITS	TOTAL UNITS	TARGET GROUP	FUNDING SOURCE	EXPIRATION OF AFFORDABILITY
Delta Plaza Apts.	*702 N. San Joaquin Street*	*29*	*30*	*Seniors*	*LIHTC; HCD; Local*	*2047*
Kentfield Apartments	*4545 Kentfield Rd.*	*89*	*90*	*Large Family*	*LIHTC; Local*	*2064*
Town Center Studios	*1604 N. Wilson Way*	*39*		*Homeless and At-Risk of Homelessness*	*HCD*	*2075*
Sierra Vista I Apartments	*Viva Plaza*	*114*	*115*	*Large Family*	*LIHTC*	*2071*
Sierra Vista II Apartments	*1520 Eleventh Street*	*99*	*100*	*Large Family*	*LIHTC*	*2072*
Gleason Park	*411 South Stanislaus Street*	*92*	*93*	*Large Family*	*LIHTC*	*2065*
Plymouth Place	*1320 N. Monroe St*	*65*	*65*	*Senior*	*LIHTC; HUD*	*2075*
Casa de Esperanza	*2260 S. Netherton Ave.*	*69*	*70*	*Large Family*	*LIHTC; USDA*	*2068*
Westgate Townhomes	*6119 Danny Drive*	*39*	*40*	*Large Family*	*LIHTC*	*2068*
Bradford Apartments	*1020 Rosemarie Lane*	*29*	*30*	*Large Family*	*LIHTC*	*2069*
Liberty Square	*804 N. Hunter Street*	*72*	*74*	*Large Family*	*LIHTC; HCD*	*2073*
Santa Fe Townhomes	*639 West Worth Street*	*30*	*31*	*Large Family*	*LIHTC; HCD*	*2072*
Grand View Village	*228 N. Hunter Street*	*74*	*75*	*Large Family*	*LIHTC*	*2074*
Main Street Manor/Almond View	*648 East Main Street*	*71*	*72*	*SRO*	*LIHTC; Local*	*2048*
Cambridge Court	*6507 Danny Drive*	*130*	*132*	*Large Family*	*LIHTC; Local*	*2050*
Pacific Pointe Apartments (fka Stockton Gardens Apartments)	*1025 Rose Marie Lane*	*79*	*80*	*Non Targeted*	*LIHTC*	*2052*

FACILITY NAME	ADDRESS	AFFORDABLE UNITS	TOTAL UNITS	TARGET GROUP	FUNDING SOURCE	EXPIRATION OF AFFORDABILITY
Granite Ridge Apartments (fka Stockton Terrace Apartments)	246 Iris Avenue	79	80	Non Targeted	LIHTC	2052
Quan Ying Senior Apartments	301 South San Joaquin Street	20	20	Seniors	LIHTC; Local	2052
Delta Village Apartments	1625 Rosemarie Lane	79	80	Non Targeted	LIHTC	2053
Emerald Pointe Townhomes	9537 Kelley Dr	18	19	Large Family	LIHTC; Local	2053
Ladan Apartments (Site A)	402 S. San Joaquin St.	10	10	Large Family	LIHTC; Local	2057
Diamond Cove II Apartments	5506 Tam O Shanter Dr	39	40	Large Family	LIHTC	2058
Valle Del Sol Townhomes	4701 East Farmington Road	74	76	Large Family	LIHTC; USDA; HCD	2059
Church Street Triplex	418 E Church St	3	3	Working families	Local	2062
Marquis Place Apartments	5315 Carrington Circle	20	21	Large Family	LIHTC; Local	2062
Wysteria	1921 Pock Lane	64	65	Large Family	LIHTC	2063
Hotel Stockton	133 E. Weber Avenue	155	156	SRO	LIHTC; Local	2064
Villas de Amistad	601 E. Main Street	89	91	SRO	LIHTC; HCD; Local	2065
Vintage Plaza (Site A)	336 California St.	17	18	Large Family	LIHTC	2065
Community of All Nations	2172 Dockery Court	73	75	Large Family	LIHTC; HUD; CalHFA; Local	2066
Cal Weber 40 Apartments	512 E. Weber Ave	39	40	Large Family	LIHTC	2068
Zettie Miller's Haven	1545 Rosemarie Lane	81	82	Developmentally Disabled, Mental Illness, Chronic illness	LIHTC; CalHFA	2069
Franco Center Apartments	144 Mun Kwok Ln	111	112	Senior	LIHTC; HUD	2069
Diamond Cove Townhomes	5358 Carrington Circle	59	60	Large Family	LIHTC; Local	2069
Village East Apartments	2501 E. Lafayette Street	187	189	Non-Targeted	LIHTC; HUD	2070
Polo Run Family Apartments	8165 Palisades Drive	315	318	Large Family	LIHTC	2070
Hampton Square Apartments	819 E. Hammer Lane	184	186	Large Family	LIHTC; Local	2070
Medici Artist Lofts	242 North Sutter Street	27	34	Large Family	LIHTC	2071
Casa Manana	3700 North Sutter Street	161	163	Senior	LIHTC; HUD	2074
Sonora Square	2 E. Sonora Street	37	38	Special Needs	LIHTC	2075
Steamboat Landing Apartments	25 S Commerce St	150	151	Senior	HUD	2022
Filipino Center	6 W. Main St	128	128	Family	HUD	2025
Villa de San Joaquin	324 East Jackson Street	30	30	Family	USDA	2026
Inglewood Gardens	6433 Inglewood Ave	84	84	Senior	HUD	2033
Stockton Silvercrest	123 N. Stanislaus St	82	83	Senior	HUD	2036

FACILITY NAME	ADDRESS	AFFORDABLE UNITS	TOTAL UNITS	TARGET GROUP	FUNDING SOURCE	EXPIRATION OF AFFORDABILITY
Park Village Apartments	*3830 Alvarado Ave*	*207*	*208*	*Family*	*HUD; Local*	*2037*
Hammer Lane Village	*210 E Iris Ave.*	*130*	*130*	*Senior*	*HUD*	*2038*
Filipino Community Building of Stockton	*443 East Sonora St*	*68*	*69*	*SRO*	*LIHTC; Local*	*2050*
Dewey Apartments	*507 N. Pilgrim St*	*10*	*10*	*Family*	*HUD; Local*	*2051*
Charleston Place Apartments	*1515 E. Bianchi Road*	*80*	*82*	*Large Family*	*LIHTC; Local*	*2052*
Grant Village Townhomes	*2040 Grant Street*	*39*	*40*	*Large Family*	*LIHTC; Local*	*2059*
Montecito Townhomes	*1339 Kingsley Avenue*	*69*	*70*	*Large Family*	*LIHTC; Local*	*2062*
Villa Monterey Apartments	*4707 Kentfield Road*	*44*	*45*	*Large Family*	*LIHTC; Local*	*2064*
Winslow Village Apartments	*5926 Village Green Drive*	*39*	*40*	*Special Needs*	*LIHTC; HCD; Local*	*2064*
Inglewood Oaks Apartments	*7007 Inglewood Ave*	*64*	*64*	*Family/Individual*	*CalHFA*	*2072*
Anchor Village	*601 N. Hunter Street*	*50*	*51*	*Veterans at risk of homeless, mentally ill individuals, families/ individuals*	*LIHTC; CalHFA; HCD*	*2074*
Total Units At-Risk		***392***				

Source: California Housing Partnership Corporation, 2022.

At-Risk Housing

Affordable housing options for most lower-income households are limited primarily to rental housing. Therefore, preserving the existing affordable rental housing stock is an important goal for Stockton. Most affordable rental housing units in the city were achieved through subsidy contracts and deed restrictions/affordability covenants in exchange for construction and mortgage assistance. From time to time, restricted units lose their affordability controls and revert to market-rate units. For instance, development facilities are typically considered at-risk due to: (1) the prepayment provisions of HUD-insured mortgage loans; (2) expiration of Section 8 and Section 236 contracts; and (3) expiration of restrictions on mortgage revenue bonds. The following describes these conditions in detail.

- Prepayment of HUD loans. In the mid-1960s, the federal government provided low-interest financing or mortgage insurance to housing developers in return for guaranteeing that rents remain affordable to lower-income households. After 20 years, the owners could prepay the mortgages and lift their rent restrictions or maintain the affordability controls until their mortgages were paid.
- Section 8 Program. In the mid-1970s, the federal government provided two approaches to encouraging the production of affordable rental housing. Under the Section 8 program, HUD provided a 15- or 20-year agreement to provide rental subsidies to property owners in return for making the units affordable to very low-income households. The income is typically the difference between 30 percent of the household's income and a negotiated fair market rent for the area. Due to expiring Section 8 contracts and uncertainty of future Section 8 funds, the future of an affordable complex receiving Section 8 funding is uncertain.
- Section 236 Program. The other federal program, Section 236, provided rent subsidies in the form of interest reduction, by which multifamily housing could be produced. Two rent schedules were used: market rent, based on a market-rate mortgage; and basic rent, based on a 1 percent mortgage. Tenants were required to pay the basic rent of 25 percent of their income,

with rent payments never to exceed the market rents. Units were restricted to households that met the low- and moderate-income limits established for the program. The subsidized housing moratorium imposed by President Nixon in January 1973 brought an end to additional Section 236 construction.

- **Bond-Financed Facilities.** State, county, and local governments have the authority to issue tax-exempt mortgage revenue bonds to provide below market-rate financing for rental housing construction. State and federal law require that multifamily facilities built with tax-exempt bond proceeds set aside a portion of units as affordable to lower-income households for a specified period of time. The typical contractual period is 10 to 15 years. After the term expires, the property owners may rent the units at market rates.
- In many communities, bond-financed facilities typically convert to market rates. Over time, rent levels increase in the community, and the difference between market versus restricted rents increases to the point that, unless additional financial benefits are offered, property owners have no incentive to maintain the units as affordable.

PRESERVATION OPTIONS

State law also requires that housing elements include a comparison of the costs to replace the at-risk units through new construction or to preserve the at-risk units. Preserving at-risk units can be accomplished by facilitating a transfer of ownership to a qualified affordable housing organization, purchasing the affordability covenants, and/or providing rental assistance to tenants.

Acquisition and Rehabilitation

One method of ensuring long-term affordability of low-income units is to transfer ownership to a qualified nonprofit or for-profit affordable housing organization. This transfer would make the project eligible for refinancing using affordable housing financing programs, such as low-income housing tax credits and tax-exempt mortgage revenue bonds. These financing programs would ensure affordability for at least 55 years. Generally, rehabilitation often accompanies a transfer of ownership.

Table HE-43 shows the estimated costs to acquire and rehabilitate the at-risk units. Acquisition costs are based on the 2023 assessed value of each property, and a per-unit rehabilitation cost of $50,000 is assumed. The total estimated cost to acquire and rehabilitate all of the at-risk affordable housing facilities in Stockton (Steamboat Landing, Filipino Center, Inglewood Gardens, and Villa de San Joaquin) is an estimated $42.2 million. This is very likely an underestimate of the actual costs of acquisition and rehabilitation since the assessed values are likely much lower than the market value for these properties.

Table HE-43: Estimated Acquisition/ Rehabilitation Costs

Stockton, 2023

AT-RISK PROJECT	NUMBER OF UNITS	TOTAL ESTIMATED COST
Steamboat Landing	*150*	*$17,939,633*
Filipino Center	*128*	*$10,442,508*
Inglewood Gardens	*84*	*$9,688,647*
Villa de San Joaquin	*30*	*$4,104,987*
Total	***392***	***$42,175,775***

Source: San Joaquin County Assessor's Office, 2023

Rent Subsidy

Rent subsidies can also be used to preserve affordability of housing. Through a variety of funding sources, the City could potentially provide rental vouchers similar to those provided through the Housing Choice Vouchers Program (formerly Section 8). The amount of a rent subsidy would be equal to the difference between the fair market value for a unit and the cost that would be affordable to a lower-income household. Table HE-44 shows the estimated rent subsidies required to preserve the affordability of the at-risk units. Based on the assumptions shown in the table, it would cost the City an estimated $775,125 annually to subsidize rent for these units, or nearly $23,253,750 over 30 years.

Table HE-44: Estimated Cost to Subsidize Rents
Stockton, 2023

UNIT SIZE	AFFORDABLE RENT FOR VERY LOW-INCOME (50% AMI)	2022 FAIR-MARKET RENTS	MONTHLY SUBSIDY PER UNIT	ANNUAL SUBSIDY PER UNIT	TOTAL AT-RISK UNITS	TOTAL ANNUAL SUBSIDY
Studio	$725	$899	$174	$2,088	80	$167,040
1-BR	$829	$904	$75	$903	223	$201,369
2-BR	$933	$1,137	$205	$2,454	48	$117,792
3-BR	$1,035	$1,607	$572	$6,864	37	$253,968
4-BR	$1,119	$1,847	$728	$8,739	4	$34,956
Total					**392**	**$775,125**

Source: California Department of Housing and Community Development, State Income Limits for San Joaquin County, 2022. U.S. Department of Housing and Urban Development (HUD) User Data Sets: 2022 FY FMR Geography Summary for San Joaquin County, California.

Replacement (New Construction)
Per-square-foot construction costs from recent approved facilities were used to estimate the cost of replacing the at-risk units if they were to convert to market-rate housing. As shown in Table HE-45, the estimated cost to replace the 392 at-risk units is about $92.3 million.

Table HE-45: Estimated Replacement Costs
Stockton, 2022

COST TYPE	PER-UNIT ESTIMATED COST	TOTAL ESTIMATED COST
Construction[1]	$192,252	$75,363,088
Land[2]	$1,604	$628,600
Building Permit Fee	$1,306	$511,888
Plan Check Fee	$548	$214,993
School District Fee	$5,840	$5,840
Impact Fees[3]	$34,401	$13,344,048
Total	**$235,592**	**$92,351,899**

Notes: Estimated cost per unit is based on a three-story residential building consisting of 27 one-bedroom units, including on-site work. Unit costs assume each unit is 1,000 square feet.

[1] The construction cost is based on $192.25 per square foot for a three-story complex and 1,000 square feet per unit sums to $192,252.78

[2] The average land cost per acre is assumed to be $202,286.

[3] Based on total fee estimates from Table HE-64.

Sources: Redfin and City of Stockton Master Fee Schedule, 2022-23.

Summary of At-Risk Analysis
In summary, the above analyses show the costs of the different scenarios to be as follows:

- Acquisition and rehabilitation: $42,175,775
- Rent subsidy: $775,125 annually ($23,253,750 over 30 years)
- Replacement: $92,351,899

Regardless of the method, preserving affordability of the at-risk units is costly. While providing rent subsidies appears to be the least costly method, Section 8 funding availability is limited and currently (2023) there are more federal and state funding sources to rehabilitate existing or build new affordable housing units. However, it may cost the City less to directly subsidize rent than assist in either the rehabilitation or replacement of the units.

Qualified entities to acquire at-risk properties and maintain long-term affordability are nonprofit or for-profit organizations with affordable housing development and managerial capacity. The following are organizations that can serve as qualified entities in San Joaquin County:

- ACLC, Inc.
  315 N. San Joaquin Street
  Stockton, CA 95202
  (209) 466-6811
- Eskaton Properties, Inc.
  5105 Manzanita Avenue
  Carmichael, CA 95608
  (916) 334-0810
- Housing Corporation of America
  31423 Coast Highway, Ste. 7100
  Laguna Beach, CA 92677
  (323) 726-9672
- L + M Fund Management LLC
  1879 Palmer Avenue
  Westchester, NY 10552
  (347) 393-3045
- ROEM Development Corporation
  1650 Lafayette Circle
  Santa Clara, CA 65050
  (408) 984-5600

- Rural California Housing Corp.,
  3120 Freeboard Drive, Suite 201
  West Sacramento, CA 95691
  (916) 414-4436
- Stockton Shelter for the Homeless,
  P.O. Box 4803
  Stockton, CA 95204
  (209) 465-3612
- Volunteers of America National Services,
  1108 34th Avenue
  Sacramento, CA 95822
  (916) 917-6848

ASSESSMENT OF FAIR HOUSING

3

INTRODUCTION

Assembly Bill (AB) 686 requires that all housing elements due on or after January 1, 2021, contain an Assessment of Fair Housing consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015. Under California law, AFFH means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."

California Government Code Section 65583 (10)(A)(ii) requires local jurisdictions to analyze racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. Although this is the Housing Element for the City of Stockton, Government Code Section 65583 (c)(9), (c)(10), and Section 8899.50, (a), (b), and (c) require all local jurisdictions to address patterns locally and regionally to compare conditions at the local level to the rest of the region. To that end, the City of Stockton has prepared a local assessment of fair housing.

This section is organized by fair housing topics. For each topic, the regional assessment is first, followed by the local assessment. Strategies to address the identified issues are included throughout the section. Through discussions with stakeholders and fair housing advocates, and this assessment of fair housing issues, the City of Stockton identified factors that contribute to fair housing issues. These contributing factors are in Table HE-48, with associated actions to meaningfully affirmatively further fair housing related to these factors. Additional programs to affirmatively further fair housing are included in the Policy Document part of this Housing Element.

This section also includes an analysis of the Housing Element's sites inventory as compared with fair housing factors. The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 added a new requirement for housing elements to analyze the distribution of projected units by income category, access to high resource areas, and other fair housing indicators compared to citywide patterns to understand how the projected locations of units will affirmatively further fair housing.

Various sources of information contribute to the Housing Element. The San Joaquin Valley REAP's "Taking Stock: A Comprehensive Housing Report for the San Joaquin Valley in 2022" provides a data package that has been pre-approved by the State Department of Housing and Community Development (HCD) and serves as the primary data source for population and household characteristics. Dates for data included in the San Joaquin Valley REAP data package may vary depending on the selection of data that was made to provide the best data on the topic. These datasets rely on data reported by American Community Survey (ACS), California Department of Finance, California Economic Development Department, U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), and the Department of Agriculture Agricultural Census. Where more current information is available, it has been provided. Please note that numbers for the same type of data (e.g., households) may not exactly match in different tables and sections because of the different data sources and samples used. The main data source for the assessment of fair housing was the HCD's AFFH Data Viewer mapping tool. Several additional data sources were used to supplement the 2022 REAP data package:

- Housing market information, such as home sales, construction costs, and rents, updated via online surveys.
- Data on special-needs groups, the services available, and gaps in the service delivery system provided via service provider stakeholder interviews.
- Lending patterns for home purchase and home improvement loans through the Home Mortgage Disclosure Act (HMDA) database.

OUTREACH

PUBLIC WORKSHOPS

Workshop #1

The first community workshop for Stockton residents as part of the Housing Element update took place via Zoom on Wednesday, September 14, 2022, from 5:00 pm to 7:00 pm. The focus of the workshop was on potential sites to accommodate the City's Regional Housing Needs Assessment (RHNA) and also to educate residents about the update process and hear resident insights and ideas about how the City can improve housing opportunities in the future. Spanish translation was available during the workshop. The community workshop was recorded and posted on the City's Housing Element web page.

City staff and consultants facilitated the workshop and 20 participants attended. Throughout the workshop, community members were asked to provide feedback, ask questions or provide comments. All questions and comments were read aloud, and either City staff or the consultants responded or documented receipt of the comment. The following summary of questions and comments relate specifically to fair housing issues.

Challenges in the permitting process - many of the comments pertained to constraints being experienced related to processing and approval of applications, which are analyzed in Chapter 6 and programs identified in the Policy Document to address potential constraints and streamline the review and project approval process.

- Furthering fair housing - the City was asked how they intend to implement the AFFH and what specific actions will be taken. Based on stakeholder and fair housing advocate input and through this assessment of fair housing issues, the City identified factors that contribute to fair housing issues, and programs to address the provision of housing for all segments of the population, particularly special needs groups and those at risk of displacement, developed.

During this workshop, attendees were asked to participate in a series of polls and select their preferred responses. The following poll questions and top responses include:

Which housing groups do you think Stockton needs to focus on and provide housing for?

- Homeless or recent individuals
- Low-income households
- Persons with disabilities

What type of housing is needed in Stockton?

- Mixed-use and rental apartments

To decide which sites are priorities for housing development, what criteria are most important to you?

- Access to grocery stores, restaurants, and shopping
- Including affordable housing.
- The following set of discussion questions was presented to residents during this virtual meeting. What neighborhoods or street corridors in Stockton should be developed with new housing?
- Why isn't housing being built in Stockton?
- What is preventing the types of housing you'd like to see from being built?

The comments elicited by these questions have been considered and incorporated into the Housing Element, as applicable.

Workshop #2

The second community workshop took place in person at the Buskirk Community Center on Wednesday, October 29, 2022, from 5:00 pm to 7:00 pm. The purpose of this workshop was to educate residents about the Housing Element update and Housing Action Plan processes and to give attendees an opportunity to share their ideas and ask related questions. Spanish translation was available during the workshop, and translation for additional languages was available upon request.

The process was similar to Workshop #1, with 20 participants attending. Input from the participants was solicited throughout the workshop. A set of discussion questions were presented to residents during this virtual meeting, which are discussed in Chapter 1 of the Housing Element in the summary of the Outreach Program. Topics participant input was requested on included:

- The most critical housing issues in the community?
- The housing types most needed in the community?
- The City's most important consideration in determining new housing opportunities?

The following summary of questions and comments relate specifically to fair housing issues arising from the above discussion questions.

Housing stock and affordability – The influx of homebuyers from the Bay Area was identified as a concern. A Stockton Housing Action Plan Market Conditions report has been completed which addresses housing prices and recent in-migration trends. As well, the effect of gentrification of neighborhoods, rising home prices and cost burden is discussed in the Risk of Displacement section in this Assessment of Fair Housing.

Renter and Property Owner Relations - The availability of data on nonresident property owners and investors was brought up. The Assessment of Fair Housing provides tenure data, and identifies rental property owner and tenant relations, including evictions and discrimination as a fair housing issue, including **Program 30. Practices to Affirmatively Further Fair Housing** to address these issues, specific nonresident and investor data was not available. A participant from Disability Rights CA offered a fair housing training to the City (for decision makers or staff).

Sites – Concern was expressed regarding identification of lower income sites Downtown in with high CalEnviroScreen scores. Unit capacity is provided in this area of high need for affordable housing to foster housing mobility opportunities and reduce the risk of displacement of residents, as well as provide housing near transit and resources. The siting of units in environmentally challenged areas is analyzed. Staff noted that the City allows up to four units by right in all residential zones. This means density can increase in most areas of the city, not just downtown. The inclusion of residential sites in commercial developments to meet the RHNA was brought up. A detailed analysis of all potential sites in the city, including mixed-use potential, was conducted to determine appropriate sites for unit capacity to meet and exceed the RHNA, as presented in Chapter 4.

Homelessness – The unhoused is a fair housing concern, and it is often difficult to collect informative data that accurately reflects the magnitude of the population at risk, resulting in undercounting. The practice of homeless sweeps and the no-camping ordinance as a fair housing issue was mentioned in the workshop discussion. The data source for analysis of the homeless, described in Chapter 2 – Housing Need

Assessment, was a Point-in-Time count conducted by the San Joaquin County Community Development Department and the Central Valley Low Income Housing Corporation in late January 2022. Land use designations that support the development of homeless shelters and transitional housing facilities is discussed in Chapter 6 of the Housing Element. Program **25. Continue to Support Organizations Assisting Homeless Persons** is included to increase shelter and transitional facilities and provide short term financial assistance for households at risk of becoming homeless, and **Program 17. Development Code Revisions** to ensure availability of sites for homeless facilities. A listing of Homeless Shelters, and Transitional Housing Facilities is provided in **Tables HE-38**, **HE-39** and **HE-40** in Chapter 2, Housing Needs Assessment.

These comments have been considered and incorporated into the Housing Element, as applicable.

CONSULTATIONS

Housing Element Consultations

In November 2022, seven consultations were conducted with Stockton stakeholders to offer opportunities to provide one-on-one input. Representatives from the following organizations were interviewed:

- The Housing Authority of San Joaquin County
- San Joaquin Fair Housing
- Valley Mountain Regional Center, San Joaquin County (Main Office)
- Disability Rights California
- Faith in the Valley
- Community Partnership for Families / The Community Foundation of San Joaquin

The stakeholders were asked the following questions, depending on the type of organization interviewed, and common responses include:

Opportunities and concerns: What are the 3 top opportunities you see for the future of housing in this jurisdiction? Increasing the variety of future developments, including mixed-use, infill development, ADUs;

- De-concentration of affordable housing;
- Improving local housing data;
- Expanding housing services/resources; Updating the zoning code to be more inclusive and accessible;
- Continuous compliance with State law.

What are your 3 top concerns for the future of housing in this jurisdiction?

- Lack of existing affordable housing, high proportion of households experiencing cost burden
- Homelessness and limited housing for formerly incarcerated individuals,
- Time frame for review and approval processes.

Housing preferences: What types of housing do your clients prefer? Is there adequate rental housing in the community? Are there opportunities for home ownership? Are there accessible rental units for seniors and persons with disabilities?

- Desire for safe, habitable, accessible, stable and affordable housing;
- Uninhabitable housing conditions and lack of landlord or property owners making improvements;
- Landlords evicting long-time tenants to increase rental prices to accommodate in-migration from higher income locations.

Housing barriers/needs: What are the biggest barriers to finding affordable, decent housing? What are the unmet housing needs in this jurisdiction?

- Limited housing supply and unmet need;
- Housing costs and affordability;
- Renter application requirements, fees and deposits;
- historical racism and segregation;
- The criminalization of the unhoused population;
- Lack of political will from elected officials.
- As mentioned before, according to report.

Housing conditions: How would you characterize the physical condition of housing in this jurisdiction? What opportunities do you see to improve housing in the future?

- Southside faces more dilapidation issues, and the conditions are believed to be worse compared to the rest of the State

- Many residents take what they can afford, including uninhabitable housing
- De-concentration of lower-income housing

COVID - How has COVID affected the housing situation?

- Pandemic unveiled serious housing issues as well as making them worse.
- Economic conditions increased number of people at risk of, or experiencing homelessness
- Inequitable distribution of resources and services;
- Unmet housing needs of formerly incarcerated individuals were at risk or became
- A rise in domestic violence cases, and due to Project HomeKey, agencies unable to place domestic violence survivors in a safe space.
- Bay Area in-migration increased resulting in rising rents.

The eviction moratorium provided safety for economically impacted renters, but impacted landlords through a lack of resources.

Stakeholders shared that the factors that limit equity and fair housing are rooted in systemic racism, capitalism, sexism, and ableism. And to address these equity and fair housing concerns, the City needs to incorporate programs that reflect the needs of those most vulnerable in the Stockton community., which include low-income households, the elderly, disabled persons, large and single person households, single female-headed households with children, persons in poverty, the homeless, farmworkers, populations of color, cost burdened renters and homeowners, among others. Recommendations include programs that support affordable housing developments, an eviction protection and right-to-counsel program, a dedicated housing trust fund for affordable housing, landlord educational tools and resources, genuine advocacy for the homeless, a universal income program, a reasonable accommodation process, and social housing opportunities for people to co-own areas/property. They also shared that the City should ensure all new developments have an inclusionary housing component, which can be done by adopting inclusionary housing programs. These recommendations have been taken into consideration and can be reviewed in the Policy Document.

Housing Action Plan/Displacement Study Stakeholder Consultations

In support of efforts to prepare a Housing Action Plan for the City of Stockton, consultant team member BAE Urban Economics participated in a total of ten interviews with area stakeholders in the Spring and Summer of 2022 regarding issues and opportunities for the production and preservation of housing. Additional interviews will be conducted in the spring of 2023 with market rate developers to inform preparation of pro forma financial models for target housing types in Stockton. Due to significant overlap in the subject matter targeted for this initial round of interviews, and the list of stakeholders to be interviewed, BAE partnered with Enterprise Community Partners which was similarly engaged in preparation of an anti-displacement strategy for the City of Stockton. Participants in the first round of interviews included representatives from the following:

- Stocktonians Taking Action to Neutralize Drugs (STAND)
- Visionary Home Builders
- The Housing Authority of San Joaquin County
- Central Valley Low Income Housing (CVLIHC)
- Reinvent South Stockton Coalition (RSSC)
- Housing Justice Coalition (Part of the RSSC)
- National Association for the Advancement of Colored People (NAACP)
- Enterprise Community Partners
- Grupe Huber Company
- Little Manila Rising

While the topics covered during each interview varied slightly based on the expertise and affiliation of the interview participant, all of the interviews covered the following topic areas:

- Housing Needs and Preferences – What types of housing are your clients or constituents looking for? What types of housing are they most struggling to locate and secure? What are the barriers they are facing? Where do they typically end up?
- Housing Instability and Insecurity – What types of housing insecurity are being observed? What trends, factors, or characteristics are contributing to housing insecurity among your clients or in your community? What solutions are being used?

- Gaps in Housing Availability – What types of housing are being undersupplied in the Stockton Market? What types are being over supplied? Why?
- Barriers to Housing Production – What are the main barriers to housing production in Stockton? How does this vary by housing type (e.g., single-family homes, missing middle housing, multifamily apartments, tiny homes, etc.)? Do the barriers to housing production vary in different parts of the community?
- Barriers to Housing Preservation – What are the main barriers to the preservation of existing housing? What should the City be doing to facilitate housing preservation?
- Causes of Residential Displacement – What are the main observed drivers of residential displacement? How are your clients or constituents being impacted? How are different groups or populations impacted? How are different parts of the city being impacted and why?

Interview participants expressed a range of perspectives and experiences, but generally agreed on the underlying economic factors contributing to a lack of desired housing production in Stockton. All interview participants acknowledged an overabundance of detached single family housing in Stockton, which represents a majority of the newly built housing inventory. Interview participants acknowledged an under production, and lack of general availability, of higher density multifamily rental and missing middle housing, both rental and for-sale, that would meet the needs of their clients. Participants indicated that new construction is generally concentrated in the more affluent neighborhoods in north Stockton, and that there are large areas that are going unserved by new market-rate development, but which feature populations that would benefit from an expansion of the housing inventory, such as in south Stockton and the downtown area. These areas tend to be lower-income and residents often have less mobility, but which still offer robust neighborhood networks and cultural affiliations. The reasons cited for the lack of development in these areas include the high cost of construction and the relatively limited purchasing power of lower-income households in these areas.

Interviews indicated that a lack of newly constructed housing is putting tenants under pressure to accept housing that is, at least in some cases, in substandard condition and often more expensive than is typically considered appropriate. Participants indicated a relatively high prevalence of multiple households banding together to afford housing, resulting in overcrowded conditions, as well as households paying well over the accepted 30 percent of their income towards housing. Due to a lack of alternative housing options, households are often reluctant to submit complaints about substandard conditions and are unable to secure housing at more affordable rates. This is particularly prevalent among renter households, though interview participants also noted problems among lower-income owner households who are having trouble maintaining their homes. This sometimes results in foreclosure or condemnation, but more often in the household selling the property, often at a suppressed value due to the condition of the property. Multiple interview participants noted that many of these houses are then being purchased by higher-income households. The impression is that they are coming from outside the area, and that they subsequently rehabilitate the property and benefit from immediate equity appreciation. Interview participants voiced concerns that this dynamic prevents lower-income homeowners from fully benefiting from potential equity appreciation. Participants recommended increased funding for code enforcement and an enhanced multifamily rental inspection program to identify habitability issues. Participants also recommended increasing funding for home rehabilitation assistance to help keep lower-income homeowners in their homes and to discourage displacement and gentrification.

Interviewees noted that housing instability and displacement in Stockton is really a function of high and increasing housing costs, both for new construction and existing units, and stagnation among local workforce wages and associated household incomes. The pandemic exacerbated these trends with many lower-wage and service sector workers either losing their jobs or taking significant unpaid leaves of absence due to business closures and work-from-home policies. Interview participants experienced a significant increase in the need for homelessness prevention and rapid rehousing services during the first two years of the

pandemic, which is now beginning to abate with the revocation of pandemic-era restrictions. Interviewees commented that the City needs to pursue an aggressive expansion of the housing stock (something other than detached single-family homes) to address the lack of inventory, as well as strong economic development programs that can improve the earning potential of existing Stockton residents. Without both an increase in housing availability and the ability of households to pay for housing, the issue will continue to get worse and the number of households facing housing instability will grow.

To facilitate the production of low-income housing, as well as transitional and permanent supportive housing, interview participants indicate that the City needs to adjust expectations regarding funding recapture, allowing more grants and forgivable loans. Interviewees also suggested the City needs to increase its willingness to allow funding to go towards supportive services and that the City needs to consider programs to reopen existing single room occupancy (SRO) properties and/or facilitate development of new SRO properties in appropriate locations. They suggested the City also needs strong policies and programs to preserve naturally occurring affordable housing, where possible. Examples of these policies and programs may include, but should not be limited to, rehabilitation funding for both rental and ownership properties, possibly coupled with workforce housing deed restrictions (i.e., limited to occupancy by households with at least one person employed within the community), rental assistance and grants for back rent, cash incentives to property owners willing to accept tenants using public assistance, etc.

Interview participants generally supported efforts to expand the housing stock with a preference for the addition of both market rate and below-market rate rental housing. There is a desire to see such development both in higher income areas that can provide better access to opportunity for lower-income households, but also within lower opportunity areas where households are experiencing the greatest need. All interview participants also acknowledged that the City's aim should be to avoid adding additional low-income housing inventory in the downtown, as the city is already at risk of creating conditions associated with concentrated poverty, which run counter to the long-term objectives of the community towards creating a commercially and culturally vibrant downtown environment for all Stockton residents. The challenge seems to be that that is where the infrastructure capacity is concentrated and where it may be possible to secure land zoned for high density housing at a relatively low cost (i.e. City owned). Also, the area is unlikely to experience market rate housing development in the near future, so it can often be attractive to try to leverage low-income housing to try and spur investment.

INTEGRATION AND SEGREGATION

Since 2017, the Tax Credit Allocation Committee (TCAC) and HCD have developed annual maps of access to resources such as high-paying job opportunities; proficient schools; safe and clean neighborhoods; and other healthy economic, social, and environmental indicators to provide evidence-based research for policy recommendations. This effort has been dubbed "opportunity mapping" and is available to all jurisdictions to assess access to opportunities within their community.

The TCAC/HCD Opportunity Maps can help to identify areas in the community that provide strong access to opportunity for residents or, conversely, provide low access to opportunity. The information from the opportunity mapping can help to highlight the need for housing element policies and programs that would help to remediate conditions in low-resource areas and areas of high segregation and poverty and encourage better access for lower-income households and communities of color to housing in high-resource areas. TCAC/HCD categorized census tracts into high-, moderate-, or low-resource areas based on a composite score of economic, educational, and environmental factors that can perpetuate poverty and segregation, such as school proficiency, median income, and median housing prices. The TCAC/HCD Opportunity Maps use a regional index score to determine categorization as high, moderate, and low resource. Census tract and neighborhood boundaries don't exactly align in the City so this analysis refers mainly to census tracts in order to address state requirements for this analysis.

Areas designated as "highest resource" are the highest-scoring census tracts in the region, falling within the 0 to 20th percentile. It is expected that residents in these census tracts have access to the best outcomes in terms of health, economic opportunities, and education attainment. Census tracts designated "high resource" score in the 21st to 40th percentile compared to the region. Residents of these census tracts have access to highly positive outcomes for health, economic, and education attainment. "Moderate resource" areas are in the 41st to 70th percentile, and those designated as "moderate resource (rapidly changing)" have experienced rapid increases in key indicators of opportunity, such as increasing median income, home values, and an increase in job opportunities. Residents in these census tracts have access to either somewhat positive outcomes in terms of health, economic attainment, and education; or positive outcomes in a certain area (e.g., score high for health, education) but not all areas (e.g., may score poorly for economic attainment). Low-resource areas score above the 70th percentile and indicate a lack of access to positive outcomes and poor access to opportunities.

The final designation is "high segregation and poverty." These are census tracts that have an overrepresentation of people of color compared to the county as a whole, and at least 30.0 percent of the population in these areas is below the federal poverty line ($27,750 annually for a family of four in 2022). In Stockton, many of the areas designated as high segregation and poverty have also been identified as racially or ethnically concentrated areas of poverty (R/ECAP) by HUD. Determination of R/ECAPs relies on a racial and ethnic concentration threshold as well as a poverty test. The racial and ethnic concentration threshold for a R/ECAP is a non-White population of 50.0 percent or more. The poverty test defines areas of "extreme poverty" as those where 40.0 percent or more of the population lives at or below the federal poverty line, or where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less. More information about R/ECAPs in Stockton is provided later in this section.

As seen in **Figure HE-1, TCAC/HCD Opportunity Areas, 2022,** Stockton has several spatial concentrations of opportunity area designations. The figure shows the 15 neighborhoods in the city as used throughout this General Plan and referenced in this section. Generally, from north to south they are:

- Trinity/Northwest Stockton
- Eight Mile/Bear Creek
- Upper Hammer Lane/Thornton Road
- Morada/Holman
- Pacific Avenue/Lincoln Village
- Brookside/Country Club
- East Stockton
- Midtown
- The Port and Mount Diablo Waterfront
- Boggs Tract
- Downtown
- South Stockton
- Mariposa Lakes
- Weston/Van Buskirk
- Industrial Annex

The northern, eastern, and western edges of the city north of the Calaveras River in the Morada/Holman, Eight Mile/Bear Creek, Upper Hammer Lane/Thornton Road, and Trinity/Northwest Stockton neighborhoods are designated Highest and High Resource. These designations extend east of I-5 in the Pacific Avenue/Lincoln Village neighborhood as far east as Pacific Avenue and as far south as West March Road. Two census tracts in the Midtown neighborhood, which include the University of the Pacific between the Calaveras River to the north, West Pershing Avenue to the west, Pacific Avenue to the east, and West Harding Way to the south; and the adjacent residential communities to the east of Pacific Avenue and west of both the Rural and San Joaquin Catholic Cemeteries, accessed off of North El Dorado Street and North California Street between East Alpine Avenue to the north and East Harding Way to the south, are designated as Highest and High opportunity areas, respectively.

Census tracts designated Moderate Resource opportunity areas are also predominantly identified in the northern portion of the city, generally north of East Harding Way; within the Upper Hammer Lane/Thornton Road and Morada/Holman neighborhoods; and residential enclaves adjacent to primarily unincorporated island areas in the lower Brookside/Country Club and eastern edge of the

Midtown neighborhoods as well as one census tract in the Downtown neighborhood.

The majority of the city south of Smith Canal to the west of North Pershing Avenue and south of West and East Harding Way to the east of North Pershing Avenue in the Midtown, Downtown, South Stockton, Port and Mount Diablo Waterfront, Weston/Van Buskirk, and Industrial Annex neighborhoods are designated by TCAC/HCD as Low Resource and Areas of High Segregation and Poverty. In contrast, Low Resource census tracts in northern Stockton tend to be more spread out and are often adjacent to Moderate and High Resource census tracts. The East Stockton neighborhood, eastern portions of the Pacific Avenue/Lincoln Village neighborhood east of Pacific Avenue, and census tracts adjacent to and north of East Hammer Lane between the two Union Pacific Railroad Sacramento Subdivision and Fresno Subdivision lines are designated Low Resource, with two small residential census tracts assigned High Segregation and Poverty designations.

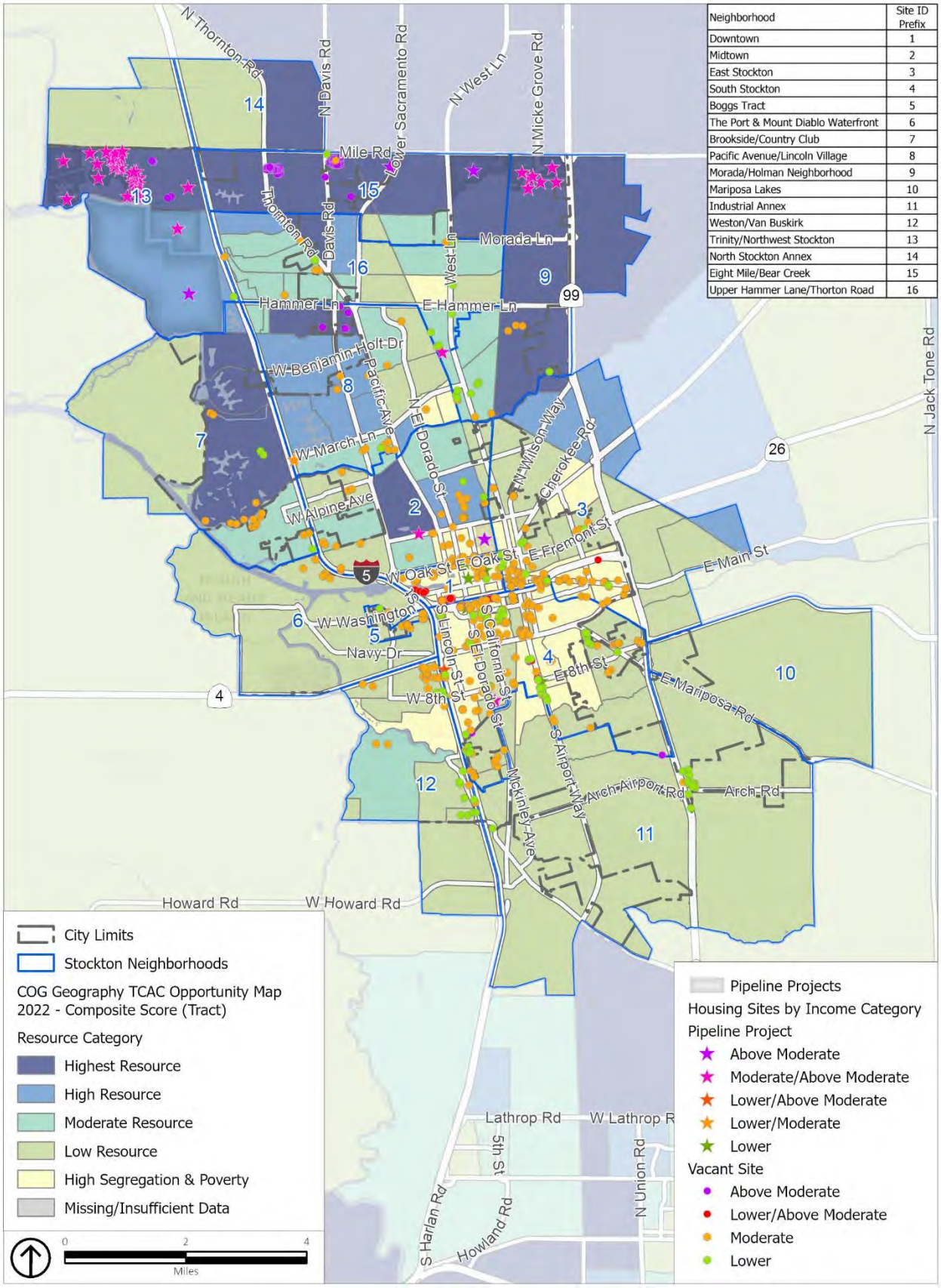
Regional Trends

Stockton is a member of the San Joaquin Council of Governments (SJCOG) joint-powers authority. SJCOG's other members are the County of San Joaquin and the cities of Lodi, Manteca, Tracy, Ripon, Escalon, and Lathrop. Based on the 2022 TCAC assessment of opportunity areas, areas on the east side of Lodi represent some of the COG region's lowest-opportunity areas, along with the areas of High Segregation and Poverty within Stockton identified previously.

Large unincorporated areas to the west of Stockton are designated as low-resource areas, as are many census tracts immediately adjacent to Stockton city limits. This is also true of central areas of Manteca, unincorporated areas just to the east of Manteca, one census tract in central Lathrop and two in central and northern Lodi. This is similar to many census tracts in the southern areas of Stockton's city limits and within its SOI.

The city of Escalon and the surrounding unincorporated areas are designated as moderate-resource areas, as is much of Lathrop and areas of north and central Tracy. The unincorporated communities of New Jerusalem and Vernalis are also within moderate-resource census tracts.Many of the high and highest-resource areas in the COG region are located at the far south, east, and north ends of the county. Unincorporated communities to the north and northeast of Stockton, such as the Morada area, are designated as highest-resource areas, which is similar to neighborhoods on the north side of Stockton. Areas north of Lodi are identified as either high or highest resource areas. This includes the Lockeford, Victor, and Collierville unincorporated areas. Unincorporated communities farther to the east of Stockton, such as Linden and Farmington, are also considered to be high resource areas. South of Stockton, the city of Ripon is divided into high and highest-resource areas, while the majority of Tracy is considered either a high or highest resource area, with the exception of three census tracts on the north side. The unincorporated communities of Mountain House, Banta, Stoneridge, and Lammersville are also located within highest-resource census tracts.

Figure HE-1: TCAC/HCD Opportunity Areas



Source: HCD, 2022

INCOME

Income is a primary indicator of a household's standard of living and is a critical factor in determining the ability of that household to balance housing costs with other basic needs, such as food and transportation. These may also result in displacement due to a number of factors in addition to housing cost burden. According to the San Joaquin Council of Governments Displacement Study, 2021, displacement pressures threaten the ability of housing-challenged households to stay in their homes and limit where these households can live, reducing their ability to stay connected with supportive networks and limiting their access to opportunity. There are three basic types of displacement risk residents of Stockton might face, which are discussed in subsequent analysis:

- Direct/Physical Displacement. Households are directly forced to relocate from or leave their current residence due to landlord practices, formal eviction, foreclosure, natural disaster, or uninhabitable and unsafe conditions.
- Indirect/Economic Displacement. Households are indirectly pressured to relocate due to rising cost of housing (cost burden), increased taxes and auxiliary fees, changes in supporting cultural and social networks, and loss or reduction of income.
- Exclusionary Neighborhood Change. Households are unable to move into a neighborhood that is experiencing housing cost increases due to gentrification or other factors, including higher-income households renting or purchasing more affordable housing stock that would have previously been accessible to them; landlord resistance to accepting Housing Choice Vouchers (HCV); competition for affordable resources favoring those with higher incomes; inability to meet credit and application and/or qualifying requirements.

Displacement risk is discussed in greater detail in the "Displacement Risk" section later in this document.

According to the 2016-2020 ACS, the annual median income (AMI) in the City of Stockton was $58,393 in 2020, an increase of more than $10,000 since 2010. The 2020 median income was notably lower in Stockton than for the county as a whole and the state, which, in 2020, had median incomes of $68,628 and $78,672, respectively. However, it should be noted that median income data in 2020 may be reflective of the impact of COVID and associated unemployment and has been increasing in 2021 and 2022 as the economy recovers.

According to **Table HE-7, Household Income Distribution**, in the Housing Needs Assessment (HNA), in 2020 approximately 25.4 percent of households in Stockton were considered very low-income, which is any four-person household that earns less than $29,197 annually (less than 50.0 percent of AMI); approximately 10.8 percent of households correlated with the lower-income category, which is any four-person household that earns between $29,178 and $46,714 annually (between 51.0 and 80.0 percent of AMI); approximately 22.4 percent of households correlated with the moderate income category, which is any household that earns between $46,715 and $70,072 annually (between 81.0 and 120.0 percent of AMI; and approximately 41.4 percent of households correlated with the above moderate-income household category, earning over $70,074 annually (above 120.0 percent of AMI).

Above Moderate-Income Household Distribution

While the median income in Stockton ranges from $12,256 to $137,083 depending on the neighborhood, in general, higher incomes are found in the northern half of the city above Harding Way, with the exception of the lower portion of the Weston/Van Buskirk neighborhood south of French Camp Slough in the southwest corner of the city. Areas where the median income is greater than $87,100, as depicted on **Figure HE-2, Median Household Incomes in Stockton,** correlate with the above moderate-income range in the city. They are concentrated outside of the core of the city along its northern and western edges in the Trinity/Northwest Stockton, Eight Mile/Bear Creek, Morada/Holman, and Brookside/Country Club neighborhoods. There is also a concentration of census tracts in the Midtown neighborhood, inclusive of the University of the Pacific campus; the American Legion and Victory Parks; and the Elmwood, South Country Club, Northbank Court, and Oxford/Bristol residential areas with median incomes ranging between $90,833 and $94,706. There is one census tract in the

Brookside/Country Club neighborhood with a median income of $137,083, the highest in the city.

Mixed Median Income Neighborhoods

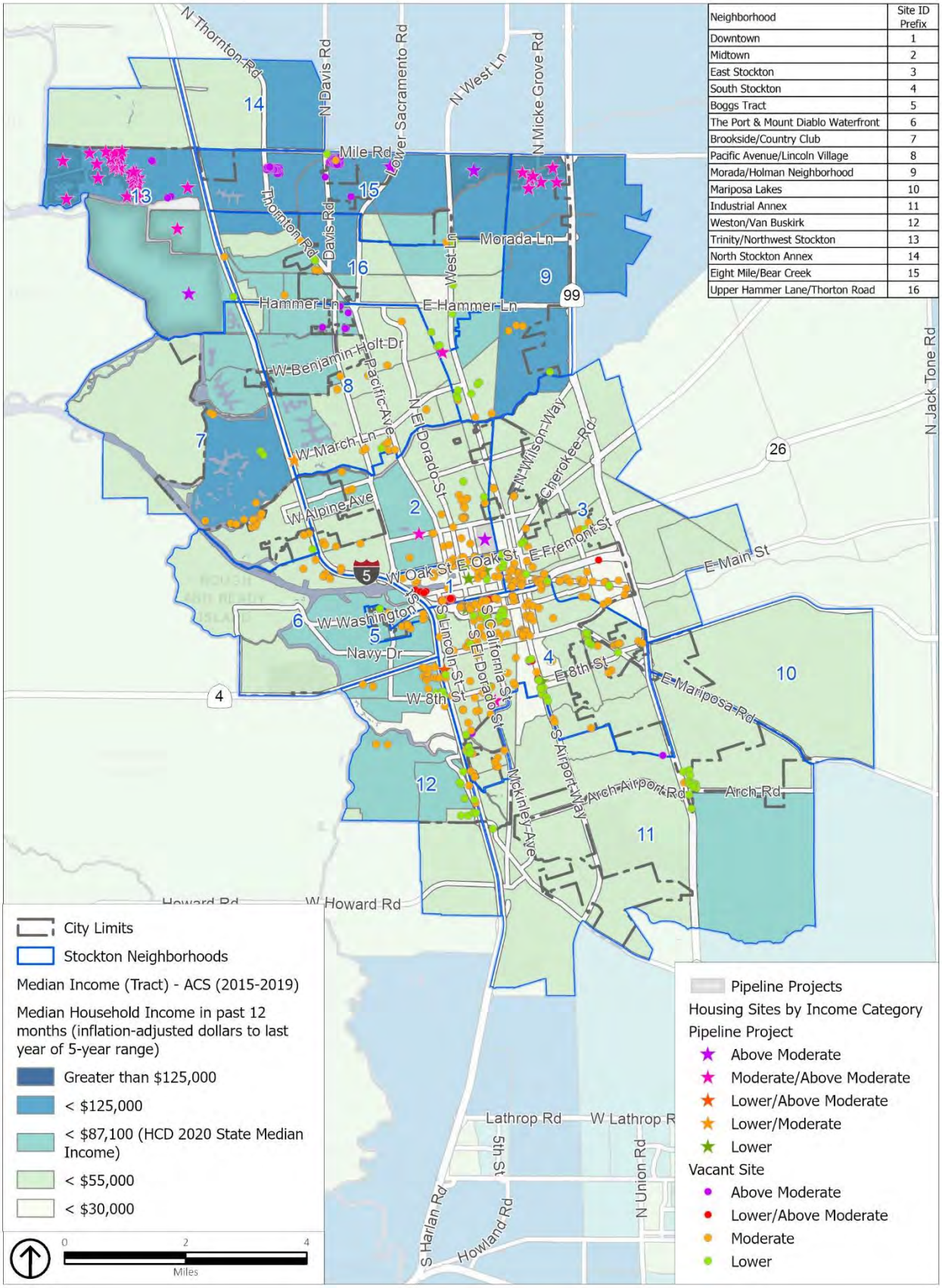
There are three neighborhoods—Upper Hammer Lane/Thornton Road, the lower portion of Morada/Holman, and Pacific Avenue/Lincoln Village in the northern portion of the city—that have historically developed along the northern extension of major commercial thoroughfares from the Downtown and Midtown neighborhoods. They include a range of incomes and TCAC/HCD opportunity designations based on location of the residential areas, the presence of affordable housing resources, type and age of housing stock, physical development barriers (waterways, sloughs, railroad tracks), and other factors. Some of the block groups in these two neighborhoods may be experiencing gentrification and have concentrations of populations that are at increased risk of displacement.

The western portion of the Upper Hammer Lane/Thornton Road neighborhood to the west of Lower Sacramento Road consists primarily of moderate- and above moderate-income households—from $55,938 adjacent to I-5 where the affordable Emerald Pointe Townhomes are located, to $108,304 in the Stonewood Estates subdivision south of Laughlin Park and White Slough. There are two census block groups in this geographical neighborhood, with median incomes in the low-income category—a mixed residential, institutional, and commercial area adjacent to I-5 along Kelley Drive, and the lower portion of the Creekside residential area including Wagner Heights Apartments and Delta Sierra Middle School. The portion of this neighborhood between Lower Sacramento Road and the Union Pacific Railroad Fresno Subdivision line is a mix of low- and moderate-median incomes, with four affordable housing complexes along Hammer Lane. There are two block groups with very low-median incomes, one of which, including the Stockton Summerplace residential area and Parklane Elementary School, has been designated a TCAC/HCD Area of High Segregation and Poverty with a median income of $26,462.

The Pacific Avenue/Lincoln Village neighborhood east of I-5, south of Hammer Lane, west of the Union Pacific Railroad Sacramento Subdivision line, and north of the Calaveras River is also primarily a mix of low- and moderate-median income areas. There are four block groups with median incomes in the very low-income category that are scattered throughout the neighborhood, and three of them are in the vicinity surrounding the San Joaquin Delta College campus. There is no pattern of concentration of very low-income households; adjacent block groups fall within the moderate- and above moderate-income categories. However, there are eight affordable multifamily housing complexes in this neighborhood, all of which are in block groups with median incomes below $30,897, and one of these block groups is designated a TCAC/HCD Area of High Segregation and Poverty and HUD R/ECAP. The presence of the affordable housing complexes generally are a contributing factor to the lower median incomes in the block groups where they are located.

A similar spatial distribution of affordable multifamily housing complexes within block groups with lower median incomes is found in the lower portion of the Morada/Holman neighborhood, with median incomes ranging from $29,359 to $52,465 in block groups that have an affordable housing resource. Historically, as discussed in the "Other Relevant Factors" section, a significant segment of the Asian community relocated to these newly developing localities during the 1960s in response to the construction of the SR-4 cross-city highway and remain a predominant community of color in the present. The very low-income block group, unlike most of the surrounding areas, which are primarily residential, consists of a mix of multifamily complexes (both affordable and market rate), vacant land, and nonresidential uses.

Figure HE-2: Median Household Incomes



Source: 2015-2019 ACS

Lower-Income Neighborhoods

A defined concentration of very low- and low-median income households and affordable multifamily complexes is evident north of the Calaveras River in the central portion of the city along the West Lane, Pacific Avenue, El Dorado Avenue, Hammer Lane, and March Lane commercial corridors, and south parts of the city in the Midtown, Downtown, and South Stockton neighborhoods between Harding Way and Charter Way, with the lowest median incomes at $12,256 and $16,750 in the heart of Downtown. These lower-income block groups are generally defined by major transportation routes, including the Union Pacific Railroad lines, rail terminal, and switching station; I-5; SR 4; and the Port of Stockton, and include a mix of single-family and multifamily residential, industrial uses, entertainment venues, public and institutional buildings, educational facilities, and commercial services. The majority of this concentration of lower-income households has a correlating TCAC/HCD designation as an Area of High Segregation and Poverty and have been identified by HUD as R/ECAPs. The pattern of primarily lower median income households in the vicinity of major transportation corridors (rail, freeways, the Port)) is evident in East Stockton as well as south of the Downtown in the South Stockton, Weston/Van Buskirk, and Industrial Annex neighborhoods. The pattern also occurs in two enclaves of Housing Authority of County of San Joaquin public housing; 436 units at Conway Homes in the Van Buskirk community with an associated median household income of $20,104; and 391 units at Sierra Vista Homes on Airport Way near the rail holding yards and Reverend Peterson and Williams Brotherhood Parks.

In Stockton, 16.8 percent of the population is considered under the poverty threshold, roughly equivalent to 14.0 percent of households that make less than 30.0 percent AMI, which is considered extremely low income. This is the highest rate among San Joaquin County jurisdictions. At the census-tract level, the highest rates of poverty, above 30.0 percent, are found south of Harding Way in the Midtown neighborhood, in the Downtown neighborhood, and south of SR-4 in the South Stockton and the East Stockton neighborhoods. The census tracts with poverty rates that are above 30.0 percent of the population generally coincide with the city's lower-income block groups (**Figure HE-3, Local Poverty Rates**). Particularly high rates of poverty are in the Downtown (47.2 percent) bounded by East Park Street to the north, the Union Pacific Railroad Sacramento Subdivision line to the east, North Madison Street and El Dorado Street to the west, and the Mormon Slough to the south. This neighborhood includes the Amtrak Downtown ACE Station, 14 affordable multifamily complexes, single-family and multifamily housing units, Weber Point Events Center, DeCarli Waterfront Square, and a mix of industrial and commercial uses. Also, 43.5 percent of the population residing in the census tract in the Weston/Van Buskirk neighborhood (the Sierra Vista Annex-Conway Homes public housing development is in this tract) has an income below the poverty level. A poverty rate of 41.1 percent is seen in the residential areas east of the Union Pacific Railroad yards on either side of Airport Way in South Stockton, corresponding to the city's lowest-income residential areas, where housing typology and the presence of industrial uses likely account for increased housing affordability and higher rates of poverty. In addition, many areas south of SR-4 have historically been used as rail yard or port worker housing and were redlined areas, as discussed in the "Other Relevant Factors" section, with patterns of low incomes persisting in these areas. In general, elevated rates of poverty (above 20.0 percent) are found in the city's lower-income residential areas and often correlate with the locations of affordable multifamily housing units and mobile home parks.

Between 2013 and 2020, incomes have shifted in the city. The proportion of very low-income households has decreased from 33.1 percent in 2013 to 25.4 percent in 2020, with a similar decrease in the proportion of households (15.4 percent in 2013 to 13.9 percent in 2020) with median incomes between $30,000 and $45,000, roughly corresponding to the low-income category. Conversely, above moderate-income households with incomes between $75,000 and $124,999 increased from 18.9 percent in 2013 to 21.4 percent in 2020. The proportion of households with incomes generally corresponding to the moderate-income category shifted only a few tenths of a percentage point. In 2013, every census tract with an affordable multifamily complex was categorized as having a median income below $40,000, whereas in 2020, many of the block groups in the Pacific

Avenue/Lincoln Village and upper Midtown neighborhoods that have affordable housing complexes also have median incomes above $40,000. The northern, western, and eastern edges of the city have also seen increased median incomes.

This demonstrates that Stockton's residents have a wide range of incomes, with some distinctly higher-income areas in the northern half of the city; lower-income households predominate in the southern portion of the city where major transportation routes, industrial facilities, and nonresidential uses exist, in addition to historical practices of redlining. This pattern of income distribution is also evident in other jurisdictions in San Joaquin County along SR-99. However, though access to resources generally corresponds to income, as shown by TCAC/HCD Opportunity designations (Figure HE-1), there may be meaningful differences in access to other opportunity area factors, including the TCAC/HCD economic score, education domain score, and jobs/proximity index scores, which may contribute to higher-resource designations in lower-income areas. To improve access to areas of high opportunity for lower-income households, the City will work with developers to identify opportunities and reduce barriers to constructing higher density and affordable housing in higher income areas, particularly in the Trinity/Northwest Stockton, Brookdale/Country Club, Eight Mile/Bear Creek, and northeastern Morada/Holman neighborhoods; infill in the vicinity the Quail Lakes subdivision in Pacific Avenue/Lincoln Village neighborhood; and in the vicinity of University of the Pacific within the Midtown neighborhood, (Programs 5, 8, and 12) and will encourage construction of ADUs across the city to increase housing mobility opportunities (Program 6).

Regional Trends

Median household incomes in the COG are distributed similarly to the TCAC opportunity area designations previously discussed. As of the 2015-2019 ACS, the only census tracts within the COG that have median household incomes lower than $30,000 are located in Stockton. However, many areas of Lodi; the unincorporated county area to the west and northwest of Stockton (including the Thornton community); communities immediately to the west of Stockton; and census tracts within Lathrop, Manteca, and central Tracy; also have median household incomes below $55,000, which is below both the State median income of $87,100 and below Stockton's 2020 median income of $58,393.

Census tracts in the far northeast and southeast of the unincorporated county tend to have median household incomes higher than $55,000 and lower than the statewide median. These areas include the unincorporated communities of Lockeford, Collierville, Woodbridge and Clements. This is also true of the city of Escalon, the southwest side of Ripon, north and central Tracy, and much of Manteca, as well as unincorporated communities of New Jerusalem and Vernalis.

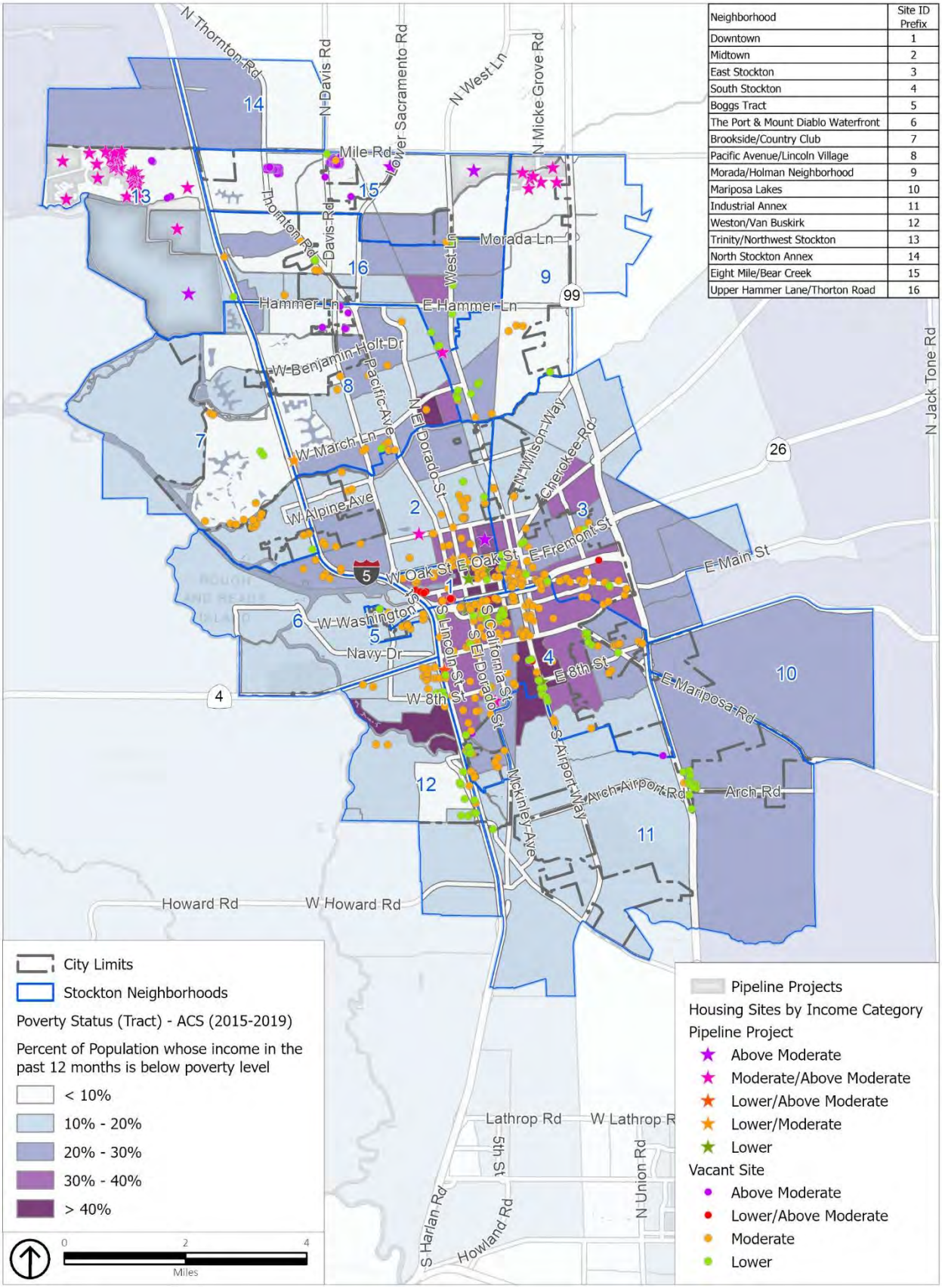
Many of the communities in the COG with incomes above the state median but below $120,000 are the same communities identified as high and highest-opportunity areas under the TCAC designation system. This includes areas in north Stockton and in the SOI area north of Stockton including Morada; the unincorporated communities of Linden, Peters, and Farmington to the east; the northeast side of Ripon; much of Tracy and the unincorporated areas to the south including Chrisman; and the majority of the Lathrop area.

The COG area's highest-income community is the census tract covering Mountain House and the north side of Tracy, with a median household income of $128,246. This is the only community in the COG with a median household income above $125,000.

Few areas of the COG outside of Stockton have high concentrations of residents with incomes under the poverty line as of the 2015-2019 ACS. A small number of census tracts on the east side of Lodi, part of the unincorporated community of August, and the census tract that includes part of the Kennedy community represent the only areas outside of Stockton city limits where more than 30 percent of residents have incomes below the poverty line. However, August and Kennedy are also within the Stockton sphere of influence (SOI) area.

More medium concentrations of poverty, between 20 and 30 percent of the population, are located in the Lockeford area, the census tract that includes Thornton, a small number of census tracts in south-central Lodi and central Manteca, and in unincorporate communities just to the east and southeast of Stockton. Less than 20 percent of residents in each of the COG's other census tracts have incomes below the poverty line.

Figure HE-3: Local Poverty Rates



Source: 2015-2019 ACS

RACE AND ETHNICITY

The City of Stockton is one of San Joaquin County's more diverse jurisdictions; its share of minority residents is 80.6 percent, compared to 69.3 percent in San Joaquin County as a whole and 63.5 percent for the State (**Table HE-5, Population Breakdown by Race/Ethnicity**, in the HNA). The largest proportionate racial and ethnic concentrations in Stockton are Hispanic/Latino (43.5 percent), non-Hispanic Asian (20.5 percent), non-Hispanic White (19.4 percent), and non-Hispanic Black/African American (11.0 percent). Other demographic groups, including American Indian/Alaskan Native, Asian Hispanic, Multiracial Hispanic, Native Hawaiian, and Other are represented by smaller populations, each comprising 2.0 percent or less of the city's population. The racial and ethnic groups that experienced the most growth between 2013 and 2020 were Hispanic or Latino residents, non-Hispanic Asian residents, and non-Hispanic Black or African American residents, and the non-Hispanic White population declined from 22.3 percent in 2013. The data also indicate an increase in the number of residents who identify as multiracial or as part of other, unspecified racial and ethnic groups.

As illustrated in **Figure HE-4, Local Racial Demographics,** the northern portion of the city generally west of Lower Sacramento Road and North El Dorado Road and north of SR-4 has a greater concentration of block groups with non-White populations—between 41.0 and 60.0 percent—than the portion of the city south of downtown and SR-4. White non-Hispanic residents comprise majorities by block group in central Upper Hammer Lane/Thornton Road and Pacific Avenue/Lincoln Village neighborhoods between I-5 and Lower Sacramento Road, and in the Brookside/Country Club neighborhood west of I-5. Also, the block groups to the east and south of University of the Pacific in the Midtown neighborhood are primarily White non-Hispanic, likely in part due to a concentration of students in the area. is also one block group in the predominantly non-White Morada/Holman neighborhood, including the Friendly Village Mobile Home Park and the Imperial Stockton Estates Mobile Home Park, with a White non-Hispanic population of 48.0 percent, followed by Hispanic at 24.5 percent and Asian at 15.8 percent. These neighborhoods generally coincide with high and moderate TCAC/HCD opportunity designations.

There are high concentrations of non-White residents, predominantly identifying as Hispanic or Latino, throughout most of South Stockton (south of SR-4), including in areas near the Stockton Metropolitan Airport and the border with French Camp, and in the East Stockton neighborhood. The data also indicate a smaller concentration of non-White residents along I-5 near West Hammer Lane, which includes a mix of Hispanic residents (around 36.0 percent), approximately 25.0 percent Asian residents, approximately 15.0 percent Black and African American, and a White non-Hispanic representation near 18.0 percent. There are also notable non-White concentrations along the city's eastern boundary toward SR-99. However, unlike the majority of areas in the city with proportions of non-White populations above 81.0 percent, in which Hispanic households are predominantly represented, the Morada/Holman neighborhood in the northeast section of the city is proportionately the most racially and ethnically diverse. The block group west of SR-99 and east of the Union Pacific Railroad Fresno Subdivision line has a predominance of Asian households (46.0 percent) followed by Hispanic or Latino households at 30.3 percent, non-Hispanic White at 10.8 percent, and Black and African-American at 7.5 percent, correlating with a high TCAC/HCD designation; the remainder of the block groups within this geographic neighborhood have mixes of Asian and Hispanic or Latino residents between 35.0 and 40.0 percent each, with non-Hispanic White and Black or African American groups ranging between 11.0 percent and 17.0 percent each. There is another concentration of very racially diverse residential areas in the Weston/Van Buskirk neighborhood, with a mix of Hispanic or Latino (39.1 percent), Asian (25.2 percent), Black and African American (21.2 percent), and White non-Hispanic 8.8 percent) residents. This data indicates that there are racially and ethnically integrated neighborhoods in the city that generally correlate to moderate and high resource designations.

Generally, the city's most racially and ethnically diverse neighborhoods coincide with the city's lowest-income neighborhoods and neighborhoods designated as Areas of High Segregation and Poverty, as well as locations of affordable multifamily housing resources and the two Sierra Vista public housing communities. These neighborhoods are found in predominantly Hispanic communities in the southern section of the city (Figure HE-4, Local Racial Demographics), although the racial and ethnic composition of the two public housing communities is more diverse, with roughly half of the residents identifying as Hispanic or Latino, and one-quarter each identifying as Black and Asian.

Similar to many jurisdictions in the San Joaquin Valley, Stockton once experienced redlining, which influenced racial and ethnic patterns in the city, and these communities may have more limited access to resources and opportunities than households with similar incomes living in other parts of the county (see the section titled "Other Relevant Factors"). However, in recent decades, Stockton has experienced dramatic integration and persistent diversity. The 2010-2014 and 2016-2020 ACS data reflect nearly identical spatial distributions of racial and ethnically diverse groups; however, there have been substantial shifts in the Pacific Avenue/Lincoln Village, Midtown, East Stockton, and Morada/Holman neighborhoods from lower to higher proportional representations of non-White demographic groups. In general, areas of the city that are the most diverse now were also the city's most diverse since the early 2000s, though these neighborhoods are more diverse today than they were previously.

This indicates that Stockton is home to a diverse population of residents with a wide range of household incomes, with generally higher incomes in areas of higher White non-Hispanic communities as well as neighborhoods with higher proportions of Asian-identifying residents on the east side of the city; distinctly lower incomes are found in communities with higher proportions of Hispanic-identifying residents living in the southern half of the city, with some neighborhoods experiencing high poverty and segregation and identification by HUD as a R/ECAP, discussed in the following section.

Regional Trends

As of the 2014-2018 ACS, much of the San Joaquin COG region is predominantly Hispanic or White, as is the case for many of the census tracts in Stockton. The Cities of Manteca, Lodi, and Ripon each have a mix of block groups with predominantly White or Hispanic populations. In Lodi, segregation between these areas seems to be more pronounced, as non-White residents make up less than a third of residents in most predominantly White block groups. In central Lodi, one block group has a non-White population that represents only 19.5 percent of the total population according to the 2015-2019 ACS. Toward the east side of Lodi, where the community is predominantly Hispanic, block groups have non-White populations of as much as 90.9 percent of residents. In Manteca, predominantly White areas still have significant non-White populations, with many predominantly White areas in the 2014-2018 ACS having non-White populations of between 50 and 60 percent in the 2015-2019 ACS due to shifting populations or having multiple moderately-sized non-White minority communities that make up a majority when combined. In Lathrop's majority Hispanic and Asian areas, non-White residents make up more than 75 percent of residents in each block group. In its predominantly White southwest side, non-White residents make up 48.4 percent of the population. Escalon is an exception to this mix of White and Hispanic communities in incorporated areas, as all of the block groups in this city are predominantly White, and non-White communities make up 31.7 to 41.3 percent of residents.

Several unincorporated communities to the north and northeast of Stockton are predominantly White, including Collierville, Acampo, Lockeford, and Clements. To the far east of the city, block groups that include the unincorporated communities of Peters and Farmington are also predominantly White. South of Stockton, the unincorporated communities of Banta, Stoneridge, New Jerusalem, and Vernalis are also predominantly White, as are the unincorporated areas surrounding Ripon and Escalon. However, as is the case in incorporated cities, in many of these areas non-White residents represent at least thirty percent of the population, indicating that some majority-White areas may be approaching a balance of White and non-White residents. The predominantly White block groups with

the lowest percentage of residents who identify as non-White are located in the north of the Linden community (28.6 percent of residents) and immediately west of Lodi (27.2 percent).

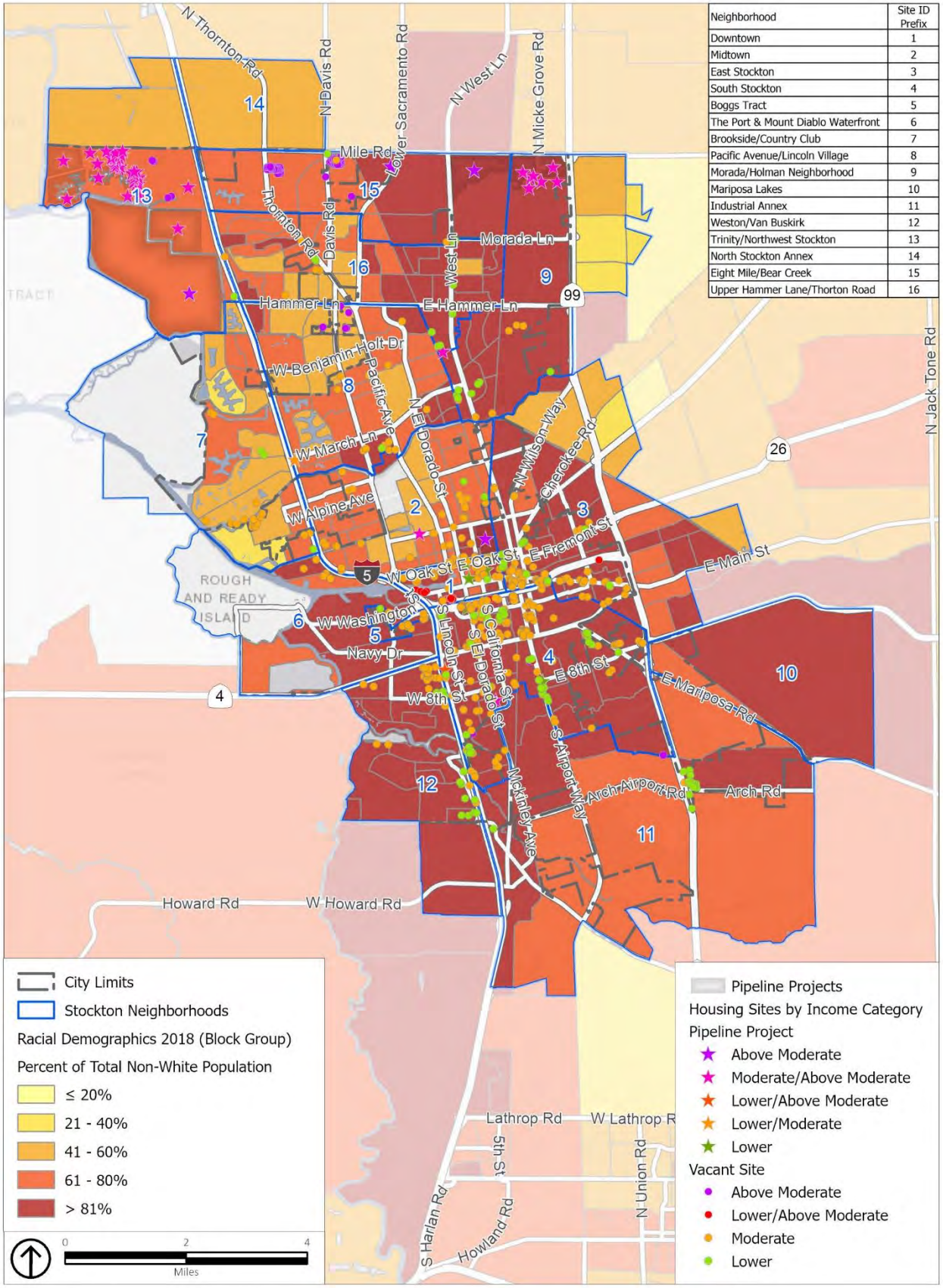
Unincorporated areas to the northwest of Stockton including Thornton are predominantly Hispanic. Of unincorporated areas in the County, this community has one of the higher concentrations of non-White residents in the county (75.9 percent). This is also true of the block groups to the southwest of Stockton and to the north or west of Lathrop, including French Camp (73.9, 80.5, and 82.3 percent), and immediately to the southeast near the airport (76.9 percent of residents). The block groups in the far southwest region of the unincorporated county, including the south side of Tracy and the unincorporated community of Chrisman, are also predominantly Hispanic, with 61.9 percent of residents identifying as non-White. It is worth noting that these large concentrations of non-White residents in predominantly Hispanic areas are not necessarily all Hispanic, but that Hispanic residents make up the largest community in the area. Block groups with predominantly Hispanic populations are also located in the east of Stockton, the Noble Acres community, part of Linden, and several unincorporated areas to the east of Stockton without larger named communities. In these areas the percent of residents that identify as non-White is closer to 50 percent.

As with several areas of north Stockton, one block group that includes the community immediately to the north of the city has a predominantly Asian population. In this block group, 86.7 percent of residents identify as non-White, though not all non-White residents necessarily identify as Asian. This high concentration of non-White residents is also true of the unincorporated Mountain House and Lammersville area (74.3 percent of residents) and a small area on the west side of Tracy (80.3 percent non-White), each of which has a predominantly Asian population. The block group covering part of central Lathrop and the area just to the north of the city is also predominantly Asian, and 82.4 percent of residents in this area identify as non-White.

Data for several unincorporated areas to the west of Stockton and north of Tracy on predominant populations and the percent of the population that are non-white are not available from the 2015-2019 ACS.

To increase housing mobility opportunities for lower- and moderate-income households and non-White households, the City will implement Program 12 to continue to support construction of high-density housing in areas with better access to opportunities to facilitate economic mobility for lower-income residents and will promote construction of a range of housing types to meet a variety of needs.

Figure HE-4: Local Racial Demographics



Source: Esri, 2018

R/ECAPS and RCAAs

Concentrations of minority populations or concentrations of affluence may indicate a fair housing issue despite relative integration compared to the region.

R/ECAPs

In 2013, HUD developed a method for identifying disproportionate impacts of poverty on racial and ethnic minority groups that relies on a racial and ethnic concentration threshold, as well as a poverty test. **Figure HE-5, Racially or Ethically Concentrated Areas of Poverty (R/ECAP)**, identifies the R/ECAP areas in Stockton by census tracts based on the HUD criteria. Concentrations of R/ECAP tracts are located throughout Downtown Stockton and the areas immediately to the south of SR-4 in South Stockton, correlating with several of the tracts identified by the Home Owners Loan Corporation Redlining Grade (University of Richmond, 2021) as "Declining" and "Hazardous," and a TCAC/HCD Opportunity Resource designation of High Segregation and Poverty. Many of the deed restricted housing complexes in the city are included within the boundaries of the R/ECAPS, with the highest concentration in the Downtown, which likely contributes to the concentration of households in poverty. The R/ECAP tract geographic distribution is very similar to that of lower income households, with proportions of renter households above 60.0 percent; between 15.0 to 29.5 percent of residents live in overcrowded conditions in all but one census tract (which is adjacent to rail switching yards and largely industrial uses); over 60.0 percent of renters pay over 30.0 percent of their income for housing (one census tract in Homestead community has slightly lower renter overpayment at 56.1 percent); and over 40.0 percent of owners overpay for housing. Also, between 20.0 percent to 60.0 percent of households in these census tracts are single female-headed households.

There are also three scattered census tracts identified as R/ECAPS in the Upper Hammer Lane/Thornton Road and Pacific Avenue/Lincoln Village neighborhoods. While the census tracts northwest of the intersection of West Lane and East Hammer Road, and the census tract southeast of the intersection of East March Lane and North El Dorado Street are designated as TCAC/HCD Areas of High Segregation and Poverty, the census tract southeast of the intersection of Thornton Road/Pacific Avenue and West Hammer Lane has a moderate TCAC/HCD resource opportunity designation. Within this census tract, the median income in 2019 was $42,939 and the percentage of persons in poverty is 21.1 percent, with 37.2 percent of children in the tract in households below the poverty level. As well, 77.2 percent of the population is non-White, which meets the requirement for a R/ECAP having a non-White population over 50.0 percent of the total tract. Based on these characteristics, this tract has a concentration of non-White households but the population rate is below that required of a R/ECAP. As stated previously, HUD identified R/ECAP areas in 2013. Therefore, more current data suggest that this area may have experienced a decrease in poverty rate. However, household characteristics still indicate a concentration of lower-income, cost-burdened households. Approximately 75.9 percent of households are renters, 57.3 percent of renter households overpay for housing, and 33.4 percent of homeowners overpay for housing; it is located in a moderate risk of flooding zone; there are two affordable housing complexes; and while the senior population is fairly low in this tract, at 12.8 percent of the total tract population, 57.6 percent of seniors experience a disability, which is equivalent to 44.8 percent of the persons with disabilities in this tract.

The City will provide opportunities for provision of mixed-income housing integration through Programs 6 and 12.

RCAAS

Where the R/ECAP areas reflect concentrations of poverty, HCD has developed an alternative metric focused on areas of Racially Concentrated Area of Affluence (RCAAs). An RCAA is defined as a tract in which the percentage of a population tract that identifies as White is 1.25 times higher than the percentage that identifies as White in the entire COG region (also called the Location Quotient), and where the median income is at least 1.5 times greater than the COG AMI. There are two RCAA areas in Stockton—one in the Upper Hammer Lane/Thornton Road neighborhood with a TCAC/HCD High Resource Opportunity area designation, and the Brookside Country Club neighborhood with a Highest TCAC/HCD Resource Opportunity area designation. The limited distribution

of RCAAs reflects the relatively high representation of communities of color in most of Stockton as well as the limited affluence level (**Figure HE-6, Racially Concentrated Areas of Affluence**).

In contrast to R/ECAPs, RCAAs usually have persisted due to decades of focused investment, appreciated value of real estate, and wealth generation resulting from discriminatory practices and covert (and in some cases overt) racially restrictive covenants, indicating possible barriers to entry for non-White and lower-income households in these neighborhoods. The UC Merced Urban Policy Lab found that White residents of Stockton are the most isolated compared with other ethnicities. Stockton's isolation index of 0.248 for White residents means that the average White resident lives in a neighborhood in which 24.8 percent of the population is White. Therefore, the higher percentage of non-Hispanic White population in the RCAAs indicates that there are other factors that have influenced this level of segregation.

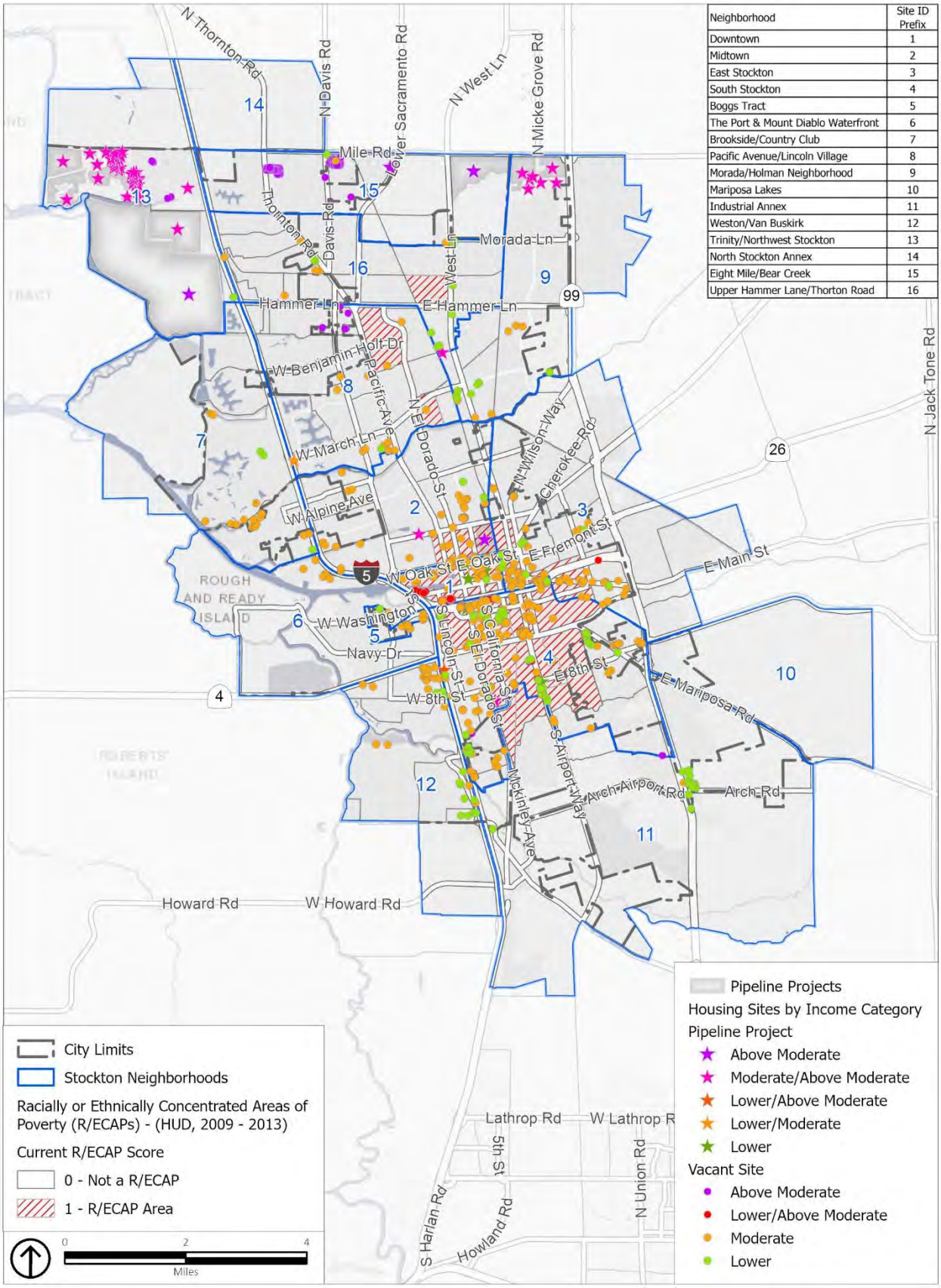
As discussed in greater detail in the "Other Relevant Factors" section, the Brookside Country Club RCAA tract coincides with the development of the Brookside Master Planned community in the late 1980s, designed as an elite golf course community emphasizing security, better educational facilities, and an exceptional quality of life. Though racial discriminatory exclusion was not direct, the community was socioeconomically differentiated by income and the ability to pay the high market rate home prices and association fees. In 2020, the RCAA has an overall median income of $105,766, and a Location Quotient of White population of 1.47 (47.1 percent White), although the actual percentage of White population varies within the four block groups encompassed by the RCAA.

Although the median income within the four block groups remains among the highest in the city, the racial and ethnic composition of the Brookside RCAA has been shifting, and should this trend continue over the next decade, the Brookside Country Club neighborhood may no longer qualify as an RCAA. In 2010 (2010 census), the proportion of White population ranged from 48.2 to 71.8 percent, with two block groups at 63.0 percent; followed by Asian residents comprising between 18.4 to 30.9 percent; and Hispanic residents did not exceed 12.6 percent in any block group. In comparison, in 2020 (2016-2020 ACS), the White population had diminished to between 32.4 and 57.1 percent; the Asian population had risen to between 20.1 and 32.4 percent for an average of 21.6 percent tract-wide; and the Hispanic population had increased to between 13.4 and 25.3 percent for an average of 22.1 percent within the tract. While this shift in the racial and ethnic composition of the RCAA suggests that White residents may be relocating elsewhere in the city, it also indicates increasing integration and housing mobility opportunities for (higher income) non-White populations.

The second RCAA is not as clearly distinguished from other census tracts with higher income residents, although it meets the parameters of the RCAA definition; the Location Quotient is 1.26 (40.4 percent White), with a median income of $96,118 and a High resource designation. The non-White population is more heavily Hispanic, at 30.5 percent of the tract population, with a fairly equal mix of Asian and Black residents—approximately 11.0 percent. The RCAA encompasses the Stonewood Estates community, also developed in the mid-1980s, with home values averaging $500,000. Similar to the Brookside RCAA, the racial and ethnic composition has shifted from 54.0 percent White in 2010 to 40.4 percent White in 2020, and though the income remains high, in relative terms the overall median income in the tract is lower than in 2010. Based on these characteristics, it is likely that this tract will no longer meet the RCAA parameters at some point in the near future. However, the shift in socioeconomic characteristics indicates that this RCAA has provided housing mobility opportunities for moderate-income households and non-White households in a TCAC/HCD High resource designated area.

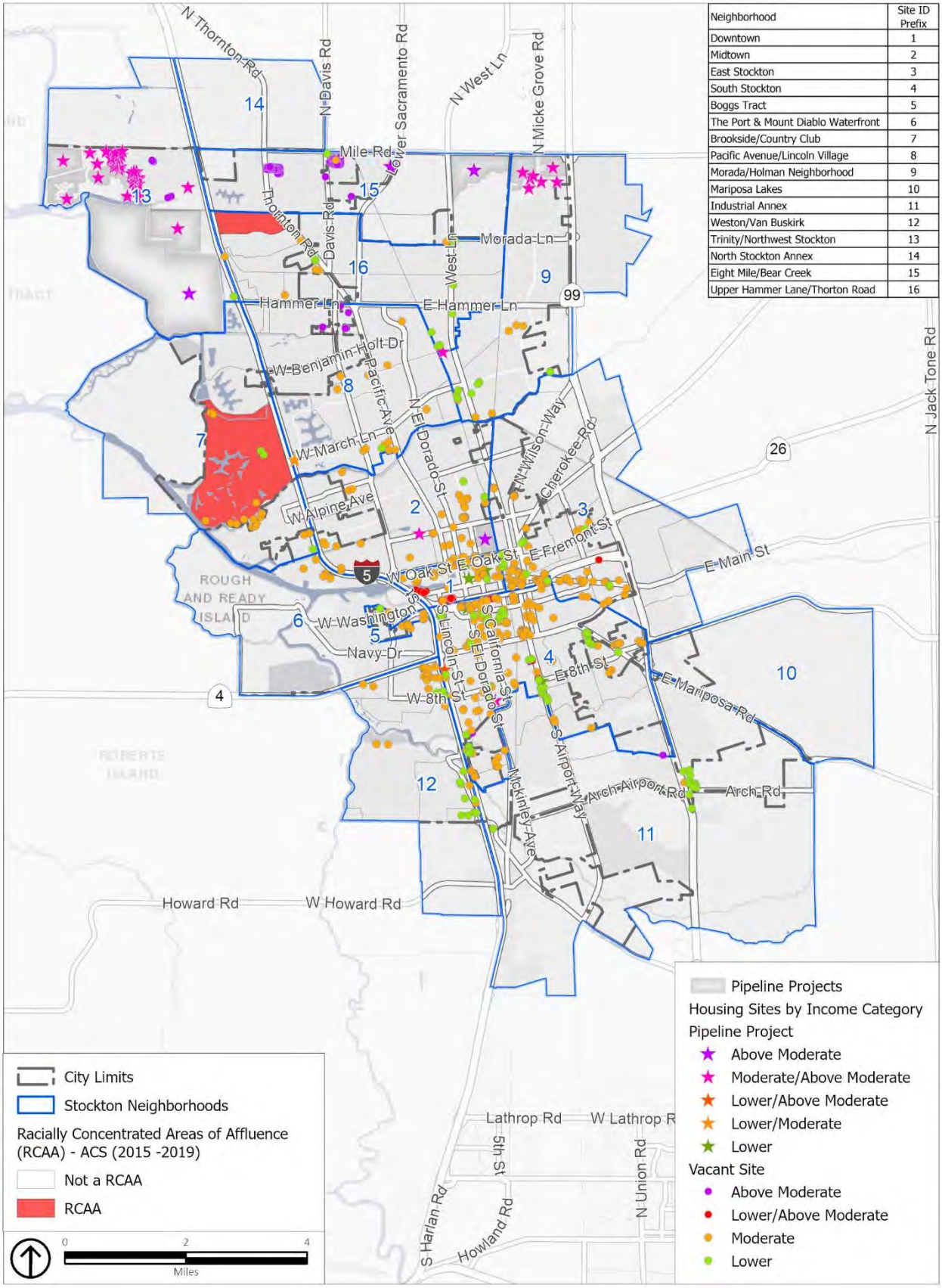
The City will commit to Programs 6, 12, 14, 15, 17, 26, and 27 to integrate affordable housing into these neighborhoods to increase housing mobility opportunities and increased access to resources for lower income households.

Figure HE-5: Racially or Ethically Concentrated Areas of Poverty



Source: HUD, 2013

Figure HE-6: Racially Concentrated Areas of Affluence



Source: 2015-2019 ACS, HCD 2022

Regional Trends

The majority of R/ECAP areas in San Joaquin COG are located within Stockton. However, one census tract on the northeast side of Lodi was also designated a R/ECAP. No other cities or unincorporated areas of the county have R/ECAP-designated areas.

Two areas of Lodi were considered RCAAs, one tract that includes the city's west side and an adjacent unincorporated area and another that includes the city's north side. Median household incomes in these areas were $109,375 and $103,750, respectively. Non-White residents represented less than a third of the population in each of these areas.

The north side of Ripon was identified as an RCAA. As previously discussed, this is a predominantly White area with a median household income of $101,957.

The area southwest of Tracy, which is a predominantly Hispanic area, was also identified as an RCAA. Though the community has a predominant Hispanic population, White residents make up 38.1 percent of the community, which is approximately at the threshold of White population to qualify as an RCAA in San Joaquin County. This area has a median household income of $113,269.

No other areas of the unincorporated county or cities within the County were identified as RCAAs.

FAMILIAL STATUS

Approximately 72.5 percent of Stockton households are family households, defined by California law as a household of two or more persons, regardless of relationship status. As indicated by **Table HE-36, Female-Headed Households**, in the HNA, 30.3 percent of family households are headed by single females with no spouse, which is greater than in San Joaquin County at 25.1 percent, and the state at 26.2 percent. Similarly, Stockton has a greater proportion of single female-headed households with children under the age of 18 (8.1 percent of all households and 26.8 percent of total female-headed households) compared to countywide (5.8 percent of total households and 23.1 percent of female-headed households) and statewide (4.7 percent of total households and 17.9 percent of female-headed households). Of the total number of female-headed households in the city, 28.9 percent have incomes below the poverty level. Overall, female-headed households with children comprise 55.5 percent of total households in poverty in Stockton, which indicates that these households are at particular risk of displacement and challenges securing affordable housing. The spatial distribution in the northern portion of the city of single-parent, female-headed households with children of between 20.0 to 40.0 percent of the total number of single female-headed households in the tract is generally consistent with TCAC/HCD Low and Moderate opportunity designations in the Morada/Holman and Upper Hammer Lane/Thornton Road neighborhoods, and the portion of the Pacific Avenue/Lincoln Village neighborhood east of Thornton Road as well as south of March Road. The entire East Stockton neighborhood shows rates of single-parent, female-headed households with children between 20.0 to 40.0 percent of the total number of single female-headed households. Data indicate that there is a common correlation between higher rates of single-parent, female-headed households with children in the census tracts with lower-incomes, a predominance of non-White households, and availability of affordable housing resources.

The spatial distribution of single-parent, female-headed households with children of between 40.0 to 60.0 percent of the total number of single female-headed households in the tract is generally consistent with TCAC/HCD Opportunity Areas of High Segregation and Poverty designations and lower-median household incomes. The majority of the southern portion of the city, including the Downtown, portions of the East Stockton neighborhood, and South Stockton neighborhoods, have rates of single-parent, female-headed households with children between 20.0 to 60.0 percent of the total number of single female- headed households in the tract. Higher rates of this household type in lower-resource, lower-income areas suggest that children in these households may have more limited access to resources and opportunities compared with children living in other parts of the city or in other family configurations. However, the higher presence of single female-headed households with children in low resource areas is not a consistent correlation in all census tracts. There are two census tracts designated TCAC/HCD High resource opportunity in the Pacific Avenue/Lincoln Village neighborhood, where between

40.0 to 60.0 percent of households are single female-headed households with children. In the census tract bounded by I-5 to the west, Grouse Run Drive to the east, and March Lane to the south, median incomes range from $60,341 to $98,491 (**Figure HE-7, Children in Female-Headed Households**), with non-White populations between 41.6 to 69.3 percent. However, although the census tract south of Weberstown Mall is designated High resource opportunity, it has a median household income of $39,240, and 79.2 percent of the population is non-White, which aligns more closely to the pattern of higher rates of this household type in lower-income, more racially and ethnically diverse areas, suggesting that the more positive TCAC/HCD designation is a result of proximity to access to resources, amenities, and educational facilities.

Regional Trends

As of the 2015-2019 ACS, few areas of the San Joaquin COG area outside of Stockton have significant concentrations of children living in households headed by a single female householder. Areas with more than 20 percent of children living in this household type tend to be located within cities, with two exceptions. In the Lockeford area, 36.4 percent of children live in this household type, and in the census tract that includes the communities of New Jerusalem and Vernalis, 26.8 percent of children live in households with single female householders. Neither of these census tracts was among the region's lowest-income areas.

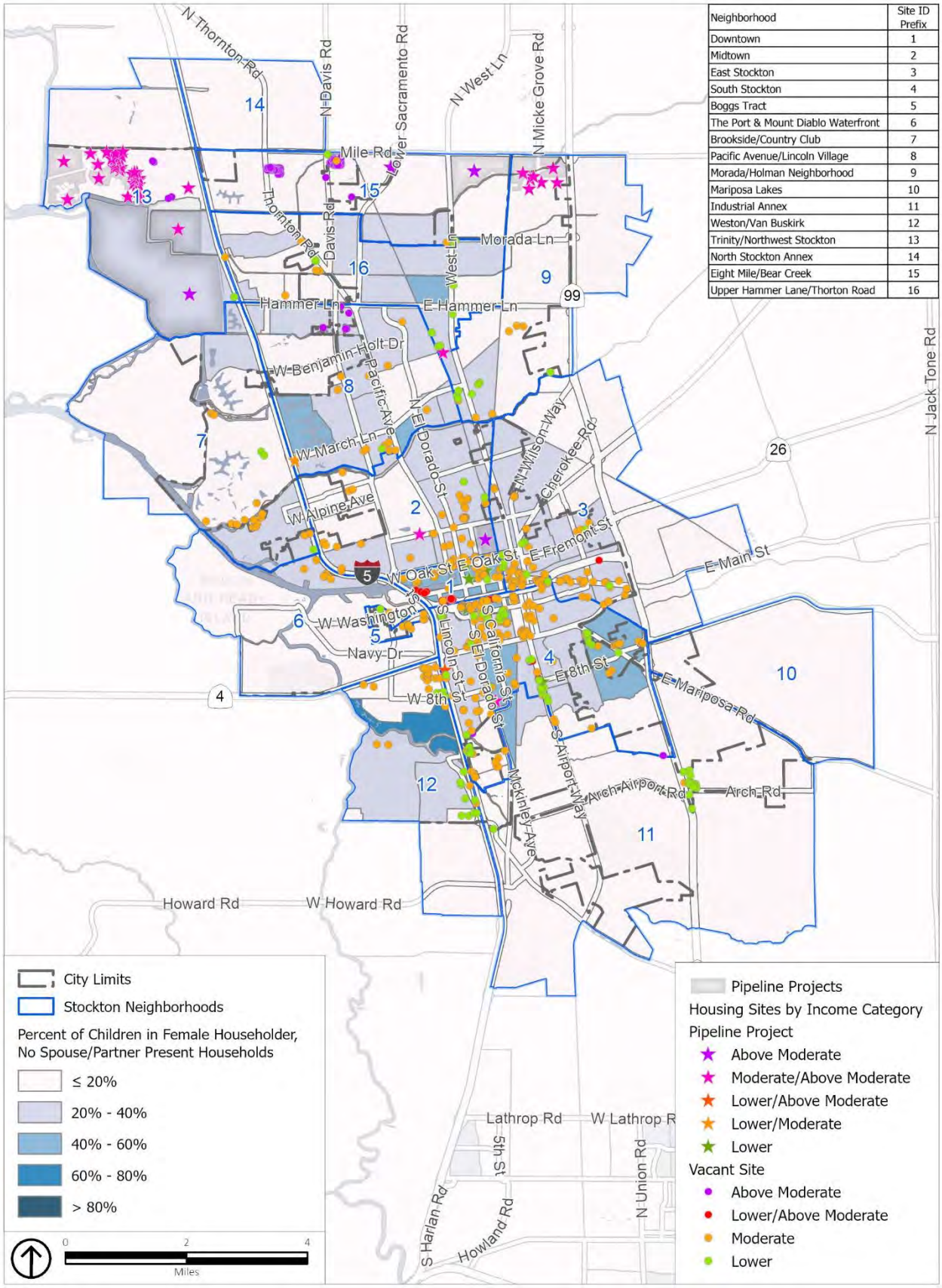
In San Joaquin COG's incorporated areas, medium concentrations of children in female-headed households are more common. In Escalon, 22 percent of children live in this household type, which is a similar rate to two census tracts in north and central Tracy (25.2 and 22.3 percent of children, respectively). Each of these census tracts has a median household income above $65,000.

Central Manteca has three small census tracts where 32.0, 27.0, and 22.9 of children live in female-headed households, and central Lathrop has one census tract where 20.6 percent of children live in this household type. However, in both cities fewer than 20 percent of children in the remaining census tracts live in female-headed households. Each of these census tracts has a median household income above $50,000.

Lodi's northeast side has a collection of three census tracts where more than one-quarter of children live in female-headed households with 33.4, 25.5, and 32.2 percent of children living in this household type, respectively. The first two of these three tracts are also the city's lowest-income areas, with median household incomes of $33,438 and $36,037. The third has a median household income of $57,931. Another tract on the city's south side has a medium concentration of children in female-headed households (23.2 percent) and has a median household income of $55,284.

The census tract with the highest rate, between 61.0 and 80.0 percent of single female-headed households with children, is found in the Weston/Van Buskirk neighborhood in the southwest portion of the city. The census tract is designated an Area of High Segregation and Poverty, which also corresponds to the location of the Sierra Vista–Conway Homes Annex affordable public housing community. This indicates a concentration of single-parent, female-headed households in a low-resource, low-income, and predominantly non-White neighborhood.

Figure HE-7: Children in Female-Headed Households



Source: 2015-2019 ACS

Data from the 2016-2020 ACS indicate that approximately 22.2 percent of households consist of residents living alone. A slightly higher proportion (54.6 percent) of single-person households are renters compared to homeowners (45.4 percent). The spatial distribution of single-person households is fairly evenly distributed throughout the city at a rate below 20.0 percent of households (**Figure HE-8, Adults Living Alone**). However, there is a concentration of single-person households ranging from 28.7 percent to 42.6 percent of the total households in three census tracts in and near the Greater Downtown area. Almost one-quarter (24.4 percent) of the population in these tracts are Generation Z (age 7 to 25), with Millennials (age 25 to 42) comprising 28.9 percent of the population, followed by Baby Boomers (age 59 to 77) at 19.3 percent, and Generation X (age 43 to 58) at 18.5 percent. Individuals over 77 represented only 7.0 percent of the population. All three census tracts are TCAC/HCD designated as an Area of High Segregation and Poverty and are identified as a R/ECAP by HUD. As well, there are 17 affordable housing resources in this area, several of which are operated by the Housing Authority of County of San Joaquin as permanent supportive housing for the formerly homeless. There is also one area with a concentration of single-person households above 20.0 percent in the census tract adjacent to University of the Pacific campus in the Midtown neighborhood with a TCAC/HCD Moderate resource opportunity designation. Within this tract, the largest age cohort is again Millennials at 25.8 percent, with Baby Boomers comprising 22.4 percent of the population, Generation Z at 20.9 percent and Generation X at 14.9 percent. In contrast to the Downtown however, the oldest age cohort represents 13.5 percent of the population. While the higher proportion of persons who live alone in this tract could be partially attributed to its adjacency to the college campus, the higher proportions of persons in the older age cohorts suggests that a portion of residents may be aging in place, particularly associate with convenient access to a range of medical facilities. Although incomes range between $17,478 to $57,03, and 20.0 percent of the population has an income below the poverty line, the two affordable housing complexes and student living arrangements may contribute to the dynamic of lower economic conditions and single-person households, and therefore the population in this tract is not considered at risk of displacement.

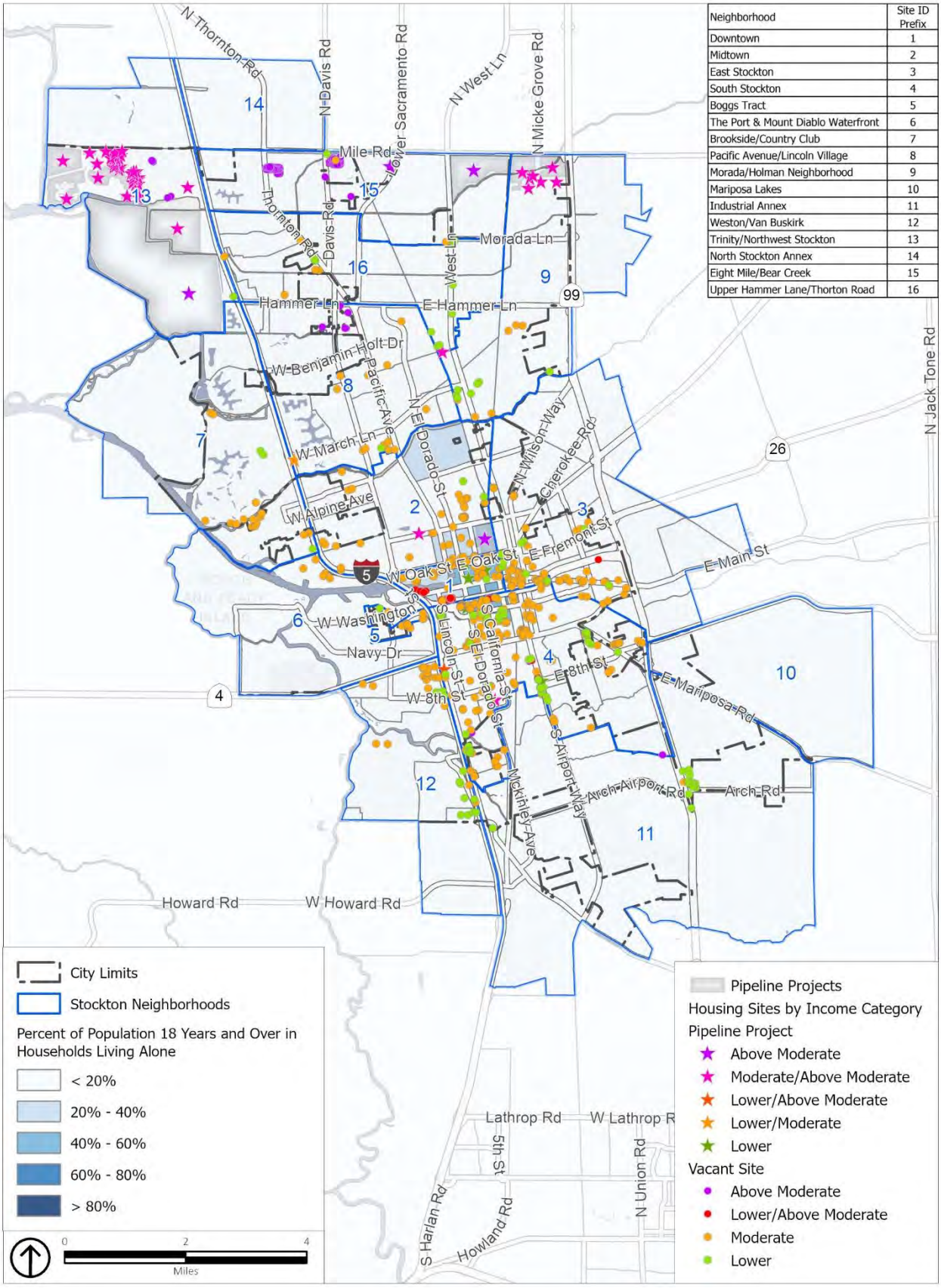
The City will implement Programs 6 and 30 to improve access to affordable housing for single-parent female headed households and single person households in areas of higher opportunity by encouraging construction of affordable units in a range of sizes, and improve opportunities in low-opportunity areas.

Regional Trends

As is the case in many of Stockton's census tracts, rates of adults living alone are typically low throughout the San Joaquin County COG area. Only one census tract outside of Stockton has a rate of adults living alone that is higher than 20 percent. This tract, located in Lodi, is also one of the census tracts with a higher percentage of children living in female-headed households. Though it is not one of the city's lowest-income tracts, with a median household income of $57,931, medium concentrations of both groups may indicate housing that may be more affordable to single-income households.

Three of the region's highest-income census tracts also have some of its lowest rates of adults living alone. Thes include the Mountain House area and the two tracts directly south, where 3.8, 3.0, and 2.0 percent of households are adults living alone. These tracts have median household incomes of $128,246, $119,479, and $113,269, respectively. These tracts also have relatively low percentage of children living in female-headed households (8.3, 5.4, and 0 percent, respectively). This suggests that housing in this area may be less affordable to single-income households.

Figure HE-8: Adults Living Alone



Source: 2015-2019 ACS

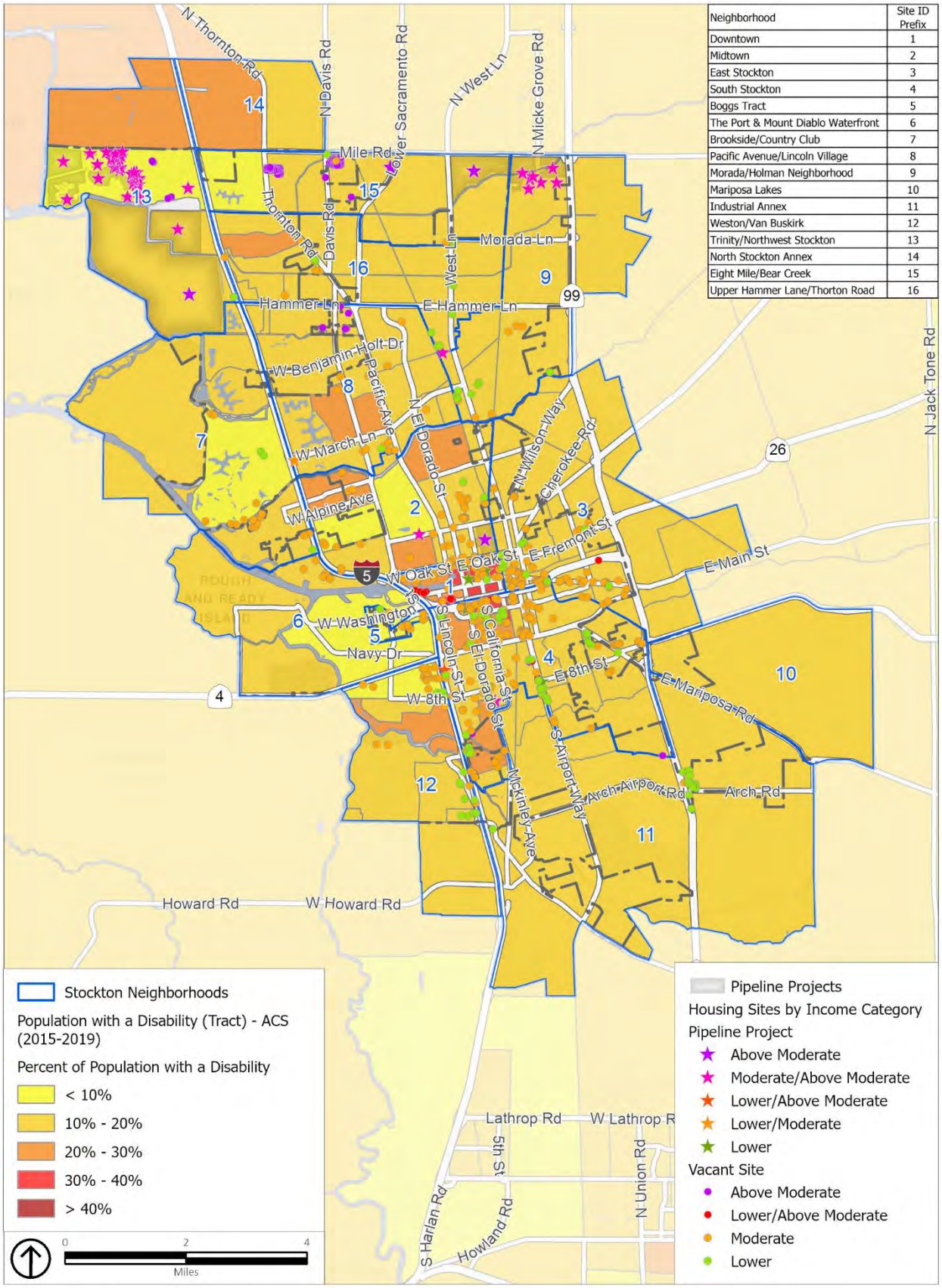
PERSONS WITH DISABILITIES

Persons living with disabilities are an important population with special needs with respect to housing. Such persons are often more likely to live in poverty, struggle to secure and maintain adequate employment, and sometimes require significant accommodations in housing. As shown in **Table HE-33** in the HNA, 14.6 percent of the total population in Stockton five years and older had one or more disabilities in 2020, compared to 13.3 percent countywide and 8.0 percent in California. Among school age children, the most frequent disability was cognitive (48.6 percent). For persons ages 18 to 64 years, the most frequent disabilities were ambulatory (27.4 percent), cognitive (23.2 percent), and independent living (20.8 percent). Among seniors, ambulatory and independent living disabilities were the most frequent (29.2 percent and 21.6 percent, respectively).

Figure HE-9, Percentage of the Population with a Disability, shows the geographic distribution of residents with disabilities by census tract. The spatial distribution of Stockton residents living with disabilities is consistent with patterns demonstrated by Areas of High Segregation and Poverty and lower-income households, with lower rates of disability generally corresponding to High and Moderate resource designated areas. The majority of the city has a rate of persons with a disability below 20.0 percent, with census tracts with 10.0 percent or below of residents experiencing a disability found in the Trinity/Northwest Stockton, Brookside Country Club, Midtown (University of the Pacific), and the Port and Mount Diablo Waterfront (which contains very little residential population) neighborhoods. Census tracts with a share of residents with a disability between 20.0 percent to 30.0 percent of the total population are found in four tracts north of the Greater Downtown. Two of these tracts are adjacent to University of the Pacific campus, and one is adjacent to and inclusive of San Joaquin Delta College. The availability of commercial uses, services, amenities, and transit opportunities in the vicinity of the campuses suggests that these areas may be attractive residential options for persons with disabilities, with TCAC/HCD designations ranging from Low resource west of University of the Pacific to High resource to the east of University of the Pacific and the San Joaquin Delta College environs. The final census tract with a high rate of persons with disabilities is in the Upper Hammer Lane/Thornton Road neighborhood between I-5 and Thornton Road, including the Wagner Heights Rehabilitation Center, suggesting that the residents of this facility contribute to the higher incidence of disability. South of Greater Downtown in the Weston/Van Buskirk neighborhood, the census tract north of French Camp and Walker Slough, west of I-5, including the Sierra Vista II affordable public housing complex, has a rate of persons with disabilities of 23.1 percent, of which 29.7 percent are seniors (although seniors comprise less than 10.0 percent of the total population in this tract, 65.0 percent experience a disability). This census tract is TCAC/HCD designated as an Area of High Segregation and Poverty, has a poverty rate of 43.5 percent, and the highest rate of single female-headed households with children.

The census tracts with the highest proportion of residents with disabilities are found in Greater Downtown Stockton, north of Dr. Martin Luther King Boulevard (formerly East Charter Way,) east of I-5, south of West Harding Way and East Park Street, and west of North Van Buren Street and the Union Pacific Railroad Sacramento Subdivision/ACE line. The proportion of persons with disabilities range from 19.6 to 20.8 percent in the census tracts south of Harding Way and north of West Park Street (between 34.8 and 47.3 percent of disabled persons in these tracts are seniors); to 31.1 percent in the downtown core (33.7 percent of persons with disabilities are seniors); to just over 25.0 percent in the census tract to the west and southwest of the Downtown core (with seniors between 27.9 and 48.9 percent of disabled persons). As previously discussed, the Greater Downtown area is designated a TCAC/HCD Area of High Segregation and Poverty, HUD identifies it as a R/ECAP, and a large number of affordable housing and homeless resources are located in the vicinity, with transit opportunities available at the Amtrak Downtown ACE Station, the nearby Amtrak San Joaquin Street, and the Greyhound terminal at the corner of South Center and East Market Street.

Figure HE-9: Percentage of the Population with a Disability



Source: 2015-2019 ACS

There are several licensed assisted living facilities available to persons living with disabilities in Stockton. According to the State of California Licensing Division, accessed February 2023, there are 227 adult residential facilities with capacity for 1,490 residents, and 3 adult day care facilities southwest of the Industrial Annex neighborhood in the unincorporated French Camp area, with daily capacity for 235 persons. These residential homes are for adults with intellectual and developmental disabilities who also have medical, behavioral, or age-related support needs. There is also capacity for 1,948 persons in licensed senior residential facilities, with some of the largest being O'Connor Woods Assisted Living with capacity for 499 seniors, Camlu Assisted Living with capacity for 160 residents, Del Monte Stockton with capacity for 158 seniors, and Golden Haven with capacity for 150 seniors. Facilities are clustered largely within the western half of the Pacific Avenue/Lincoln Village; in the vicinity surrounding San Joaquin Delta College and the commercial services and amenities along Pacific Avenue and March Lane; and in the lower Morada/Holman neighborhood. There is also a cluster of assisted living facilities in the Midtown neighborhood in the vicinity of the St. Joseph's Medical Center between Pacific Avenue and North Airport Way, as well as within the Greater Downtown area in higher-density neighborhoods. Most facilities correspond with areas of concentrated disability, therefore explaining the higher rates of disabilities in these tracts compared to other areas of the city. As well, multifamily senior independent and single-family active adult communities are located throughout the city.

The City also requires new developments to comply with Title 24 of the 2022 California Building Code to ensure that all new construction meets accessible design standards, thus ensuring that all new housing is accessible for all residents regardless of disability. Additionally, the City will ensure that older housing that may not meet the same accessibility requirements can be adapted as needed through its Reasonable Accommodation process, discussed in the Governmental Constraints section of this Housing Element, and by seeking funding to assist with modifications (Program 29).

To improve access to housing for senior residents and other residents with disabilities, the City has included Program 27 to encourage all new units to be universally designed so they are accessible for both occupants and visitors.

Regional Trends

Most areas of the San Joaquin COG area outside of Stockton have rates of disability lower than 20 percent of residents, with the exception of the census tract that includes the community of Thornton, where 20.4 percent of residents have a disability, and one census tract in Manteca, where 20.3 percent of residents had a disability. Of the Thornton tract's residents with a disability, 44 percent were senior residents (i.e. over 65 years old). The tract covers a large unincorporated area, but also extends slightly into the northern part of Stockton's SOI. Housing in this area may be more affordable to residents with disabilities.

While as previously discussed there are several census tracts within Stockton that have higher or lower concentrations of residents with disabilities, many have similar rates to unincorporated areas to the west and south of the city, as well as to much of Manteca (between 10 and 20 percent of residents).

In Manteca, only 29.2 percent of disabled residents in its tract with the highest disability rate were seniors. The concentration of residents with a disability in this area of Manteca is likely attributable in part to the presence of Mercy Adult Care, an assisted living facility, and possibly to Union Court, an affordable housing property that may be more affordable to residents with disabilities.

Communities of the COG area with the lowest percentage of residents with disabilities include the two higher-income census tracts in and around Mountain House (6.5 and 5.6 percent of residents, respectively). Of disabled residents in these two tracts, 46.0 and 55.8 percent are seniors. This indicates that it may be more challenging for residents with existing disabilities to move into this community, potentially due to high housing costs. It is possible that older residents with disabilities in this area may have already owned their homes prior to developing a disability.

ACCESS TO OPPORTUNITY

TRANSIT MOBILITY

Transit mobility refers to an individual's ability to navigate the city and region on a daily basis to access services, employment, schools, and other resources. Indicators of transit mobility include the extent of transit routes, proximity of transit stops to affordable housing, and frequency of transit.

Regional rail transit is provided by the San Joaquin Regional Rail Commission (Amtrak San Joaquins), which services 18 train stations in the San Joaquin Valley. Originating in San Francisco, the route travels to Oakland and Richmond (with connection to BART); up though Sacramento to Stockton; continuing to Modesto, Merced, Madera, Fresno, Hanford, and Bakersfield; to Los Angeles; and through Orange County to San Diego, with intermediate stations. ACE rail provides four trips per day to the Tri Valley and Silicon Valley. Sacramento service (including a shuttle connection to the Sacramento Airport) is expected to begin operating in 2025. In addition to rail service, Amtrak San Joaquin offers a Thruway Bus network with a connection at the Stockton San Joaquin Street Station serving Los Angeles, San Francisco, Yosemite, Napa, Las Vegas, Arcata, Chico, and San Luis Obispo. Thruway connections are also available between Redding and Sacramento, and between Santa Cruz and Stockton via San Jose on the Altamont Corridor Express, connecting to Silicon Valley business shuttles and BART.

Stockton Metropolitan Area residents are served by the San Joaquin Regional Transit District (RTD). There are six transit service types in the RTD system serving Stockton. The RTD Local fixed route connects BRT Express, Intercity Local, Hopper, and Commuter services as well as VanGo! and Dial-A-Ride paratransit services. San Joaquin RTD is one of the transit operators in the Access San Joaquin Consolidated Transportation Services Agency formed by multiple transit operators in San Joaquin County. One of the primary goals of Access San Joaquin is to improve the quality of transportation services for low-mobility groups such as seniors and people with disabilities, discussed in greater detail later in this section.

Two Commuter routes provide service north to Sacramento. Route 150 operates between the Downtown Transit Center and the Dublin BART Station between 4:00 am and 7:20 pm on weekdays, with a stop at the Tracy Transit Station and weekend service between 7:00 am and 10:30 pm; Route 163 connects Stockton to Lodi and Sacramento via SR-99 on weekdays, with service originating in Stockton at 5:30 am and the last bus from Sacramento arriving back in Stockton at 6:30 pm. Monthly round-trip fares from Stockton to Sacramento are $176 monthly or $7.00 one way.

RTD launched its first Bus Rapid Transit (BRT) Express Corridor in 2007. BRT Express routes are key corridors, some up to six miles in length, and are important interconnections within the transportation system for the city of Stockton. BRT operates five fixed local intracity express routes between the Downtown Transit Center at California Street and East Weber Avenue, throughout the city, with connections at the Hammer Transfer station. Routes are operated from 5:20 am to 10:11 pm on weekdays and from 7:00 am to 7:44 pm on Saturday, depending on the route.

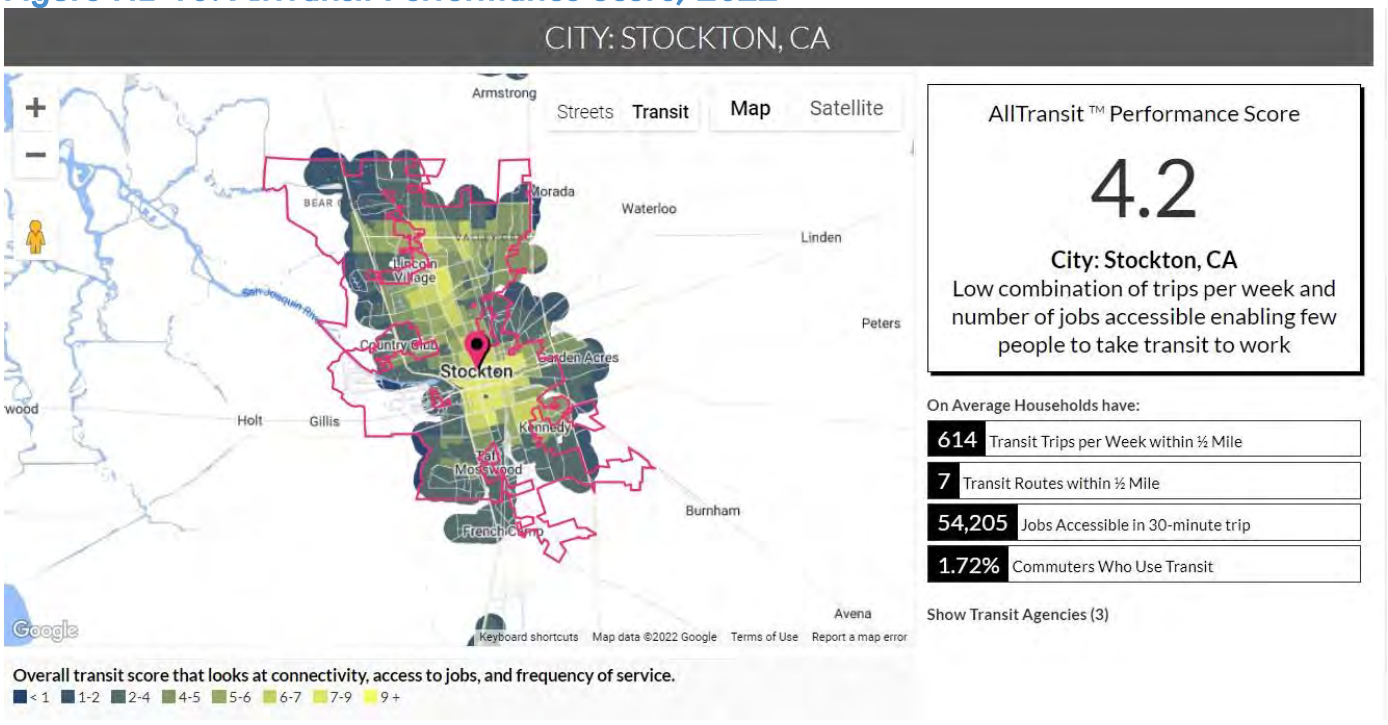
There are 21 local routes that serve the Stockton community via the Downtown Transit Center, Mall Transfer Station, and Hammer Transfer Station. As well, there are seven Local Hopper routes and five Hopper County routes. Metro Hopper is a deviated fixed-route service serving popular destinations throughout the Stockton city limits, operating Monday through Friday, 6:00 am to 6:30 pm, running approximately every hour. County Hopper is a deviated fixed-route service serving San Joaquin County and providing intercity connections between Stockton, Tracy, Lodi, Manteca, Ripon, Lathrop, and Escalon. There are five weekday routes that operate from 5:30 am to 9:00 pm. The BRT Express, Local, Intercity, and Hopper systems charge $1.50 for a single ride; the discounted rate for seniors over age 60, persons with disabilities, and Medicare cardholders is $0.75; and children are free. A one-day pass is $4.00 with the discount rate at $2.00. Monthly full-price passes are $65.00, with discount fares at $30.00, and special student fares at $40.00.

The new RTD VAN Go! pilot program offers trips throughout San Joaquin County, with no set zones or transfers required. Van Go is an on-demand ride-share service that can be booked up to 48 hours in advance. Travel does not operate on a fixed schedule; however, patrons are provided an estimated pick-up window. From one to three passengers can be accommodated. The set fee for the first five miles of a personalized route is $4 per person, with $0.50 per additional mile per person. Discount fare cards are available for $3.00 per person with a $0.50 per mile charge.

In order to accommodate ADA-certified passengers who are not able to reach fixed-route stops, each Hopper can deviate from its normal route a distance of up to one mile. The service covers approximately 75.0 percent of the Stockton Metro Area for ADA-certified customers with the one-mile deviation. Within a rural area, each County Hopper can also deviate from its normal route a distance of up to one mile. Reservations are required. RTD offers Paratransit Dial-A-Ride for those who qualify under the Americans with Disabilities Act (ADA). This program is specifically designed for individuals who, due to their disability, are functionally unable to use fixed-route services in San Joaquin County. This service is available seven days a week by appointment only and operates within three-quarters of a mile of Stockton Metro Area (SMA) fixed routes. Persons interested in this service must obtain certification under the ADA through an eligibility process.

According to AllTransit, (see **Figure HE-10, Transit Score in Stockton**), Stockton has an overall transit score of 4.2, which is comparable to other cities in the San Joaquin Valley, reflecting a relatively low combination of trips per week and number of jobs accessible via transit. While there are seven transit routes in Stockton, with most residential neighborhoods located within a half mile of one or more routes, only 1.7 percent of commuters use transit. Annual ridership on the Altamont Corridor Express (ACE) commuter rail service between Stockton and Santa Clara has more than doubled from 2010 to 2019, suggesting that commuters from Stockton may rely on ACE rather than local and regional bus routes because their jobs that are more easily accessible via ACE.

Figure HE-10: AllTransit Performance Score, 2022



Source: AllTransit, 2022.

HOUSING MOBILITY

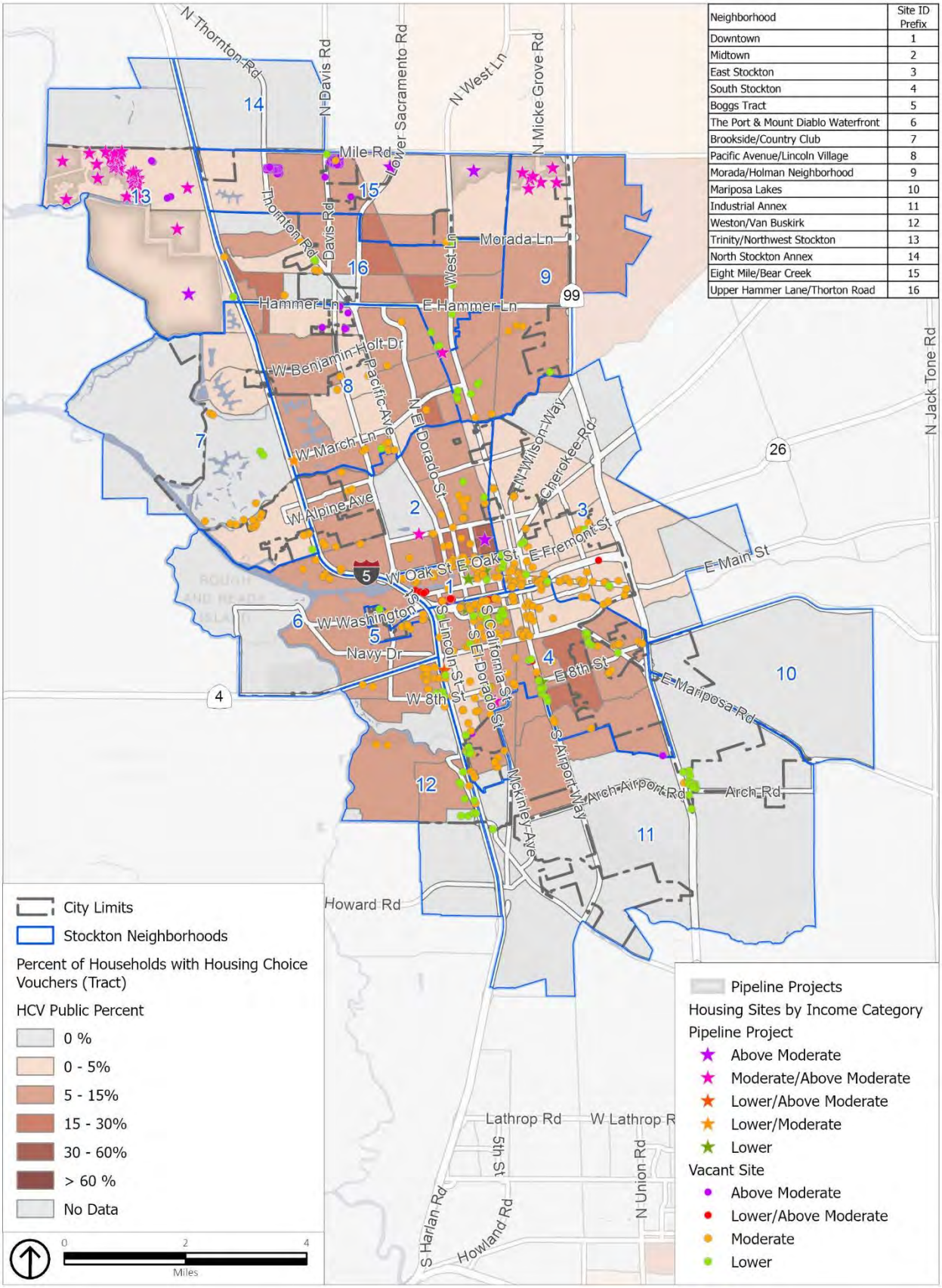
As presented in HNA **Table HE-31: Housing Tenure, 2020**, 50.1 percent of households are renters in Stockton. The homeownership vacancy rate in the city is 0.4 percent, and the rental unit vacancy rate is 2.6 percent. This may indicate that, while there is a greater shortage of ownership units for renters seeking homeownership and existing homeowners seeking a new home, there are also limited mobility opportunities for households seeking rental opportunities. Renters are the slight majority tenure in Stockton, and HCV participants are present throughout most of the city (**Figure HE-11, Housing Choice Voucher Distribution in Stockton**). There are six census tracts in which 15.4 to 28.8 percent of renter households use an HCV. Three of the census tracts with HCV usage above 15.0 percent are in the Upper Hammer Lane/Thornton Road neighborhood. The greatest concentration is in the Stockton Summerplace and Knickerbocker/Tam O'Shanter Drive residential areas, where 28.8 percent of renter households use an HCV. The homes in these areas are generally older, smaller single-family stock, much of which has been converted to rental units, with high proportions of renter households. In addition to HCV usage, there are also two affordable multifamily complexes within this census tract providing 499 affordable housing units. Correlating to this high HCV usage and presence of affordable housing units, the rate of poverty is 36.3 percent, with median incomes ranging between $26,462 and $37,127.

The second highest concentration is found in the Pacific Avenue/Lincoln Village neighborhood, to the southeast of the Pacific Avenue commercial corridor, where 22.7 percent of renters use an HCV, and renters comprise 85.3 percent of households. In addition to the HCVs, there are two affordable multifamily complexes offering 133 units, and the housing stock includes several condominium type complexes. Correlating to this high HCV usage and presence of affordable housing units, the rate of poverty is the highest in the city, at 41.9 percent, with median incomes in the two western block groups of this tract at $25,328 and $28,419, and concentrations of non-White populations above 93.5 percent. The census tract in the Midtown neighborhood directly adjacent to Downtown, inclusive of the Cal State University Stanislaus–Stockton campus, is also an area with a high poverty rate at 33.9 percent and low median incomes between $13,244 and $33,873 (although these incomes may reflect population associated with the college) and reflects an HCV usage rate of 16.7 percent.

High rates of HCV use (15.5 percent) are also found along the southeast edge of the South Stockton neighborhood in a census tract inclusive of unincorporated county land. In addition to HCV usage, the Housing Authority of the County of San Joaquin and Central California Housing Corporation provide 215 Sierra Vista Homes public housing units. Correlating to this high HCV usage and presence of affordable housing units, a location in the vicinity of the Stockton Airport, industrial uses, and the Union Pacific Railroad track switching yards, the rate of poverty ranges from 41.1 percent in the northern block group to 31.5 percent in the southern block group, with median incomes ranging between $24,743 to $26,050 and over 98.0 percent non-White populations.

Throughout the rest of the city, HCV renter use is lower than 15.0 percent, with the majority of the city having HCV usage rates between 5.0 and 15.0 percent (**Figure HE-11, Housing Choice Voucher Distribution in Stockton**), with rates between 10.0 to 15.0 percent adjacent to tracts with the highest concentration of voucher users. The lowest HCV usage is found in the northern portions of the city, the western edge, in the East Stockton neighborhood, and in the Pacific Avenue/Lincoln Village neighborhood around San Joaquin Delta College and University of the Pacific. The concentration of voucher recipients in the neighborhoods with HCV rates above 15.0 percent may be due to the availability of housing that is affordable with a voucher, meets the condition requirements of the voucher, or that landlords in other areas of the city are unaware of the requirement to accept vouchers. The concentration in the Stockton Summerplace and Knickerbocker Drive residential areas may also be due to the high percentage of female-headed households found in that census tract.

Figure HE-11: Housing Choice Voucher Distribution in Stockton



Source: HUD, 2021

Stockton median rent for apartments and condos is $1,823, based on a survey of 97 available rentals on October 12, 2022. The price range for apartments was between $850 to $2,437 for studio to four-bedroom units (see HNA **Table HE-30: Average Rental Rates, 2022**). Based on 2022 ability to pay for housing based on HCD Income Limits as shown in **Table HE-27** in the HNA, only households with median incomes would be able to afford the median rent. The fair market rent for three-bedroom units, the most common size rental unit in the Stockton MSA, as established by HUD, is $1,607, but the average monthly rent for a three-bedroom unit, inclusive of multifamily units, condos, duplex to fourplex units, or single family attached or detached units converted to rental properties, was $2,357, which would be above the affordability range of lower- and median-income households. This indicates that the majority of market-rate rental units, at sizes appropriate to accommodate a variety of household sizes, are only attainable to moderate-income households, indicating a need for additional stock of rental units available at fair market rents affordable to lower-income households, particularly very low- and extremely low-income households. To increase opportunities for housing mobility, the City shall work with the Housing Authority of San Joaquin County to increase voucher acceptance in areas of higher income through Program 11. Strategies may include partnering with the Housing Authority to provide biannual training to landlords regarding fair-housing requirements, including the requirement that they accept vouchers, and educate property owners in Moderate resource areas, as defined by TCAC higher-income neighborhoods, about the benefits of voucher holding-tenants, encouraging them to market available units at their rental properties to voucher holders; and assess the feasibility of a landlord incentive program for landlords that choose to accept voucher-holding tenants. The landlord incentive program could be focused on Low resource areas, as defined by TCAC, or neighborhoods that experience higher rates of rental increases.

Regional Trends

HCV use in the San Joaquin COG region tends to be concentrated around the City of Stockton and areas in its SOI. In many unincorporated areas outside of the Stockton SOI, most tracts had no renter households using HCVs, and in tracts where HCVs were in use, fewer than five percent of renter households used them. Unincorporated communities with HCV usage included the northern area of Mountain House, where 2.0 percent of renter households (24 households) used HCVs. In the Census tract between Stockton and Lodi, 3.0 percent of renter households (19 households) used HCVs.

Within other cities in the COG area, fewer than 5 percent of renter households used HCVs in most census tracts where HCVs were in use. This includes one census tract in Tracy (3.7 percent of renter households, or 33 households) and eight in Lodi, ranging from 1.2 to 2.2 percent of renter households. One census tract in central Manteca had an HCV usage rate of 6.1 percent of renter households, the highest outside of the Stockton area. Four other tracts in Manteca had households using HCVs, with rates ranging from 1.6 to 4.7 percent of renter households. No renter households in Lathrop, Ripon, or Escalon used HCVs.

Employment Opportunities

According to Census Longitudinal-Employer Household Dynamics Origin-Destination Employment Statistics (LODES) data, 34.4 percent of the labor force in the city of Stockton is employed in the city itself; conversely 65.6 percent of Stockton residents are employed outside of the city limits. 53.8 percent of Stockton residents are employed within the San Joaquin County metropolitan area, while 19.4 percent of Stockton residents work elsewhere in the county. Approximately 16.5 percent of Stockton residents are employed in the San Francisco-Oakland-Berkeley MSA, 9.2 percent in the Sacramento-Roseville-Folsom MSA, 4.8 percent to the San Jose-Santa Clara MSA, and 3.3 percent work in the Modesto MSA. A small proportion, less than 1.5 percent each, are employed in Solano County, Fresno County, and other southern California locales, although 2.6 percent are employed in the Los Angeles-Long Beach-Orange County MSA. Although specific data is not available, the recent work-from-home employment trend that increased remote employment potential may account for a portion of the employment locales in outlying metropolitan areas. Commutes over 50 miles, generally outside of San Joaquin County, are primarily to the west and southwest toward the Bay Area (54.6 percent of long-distance commutes), with 26.1 percent of the long

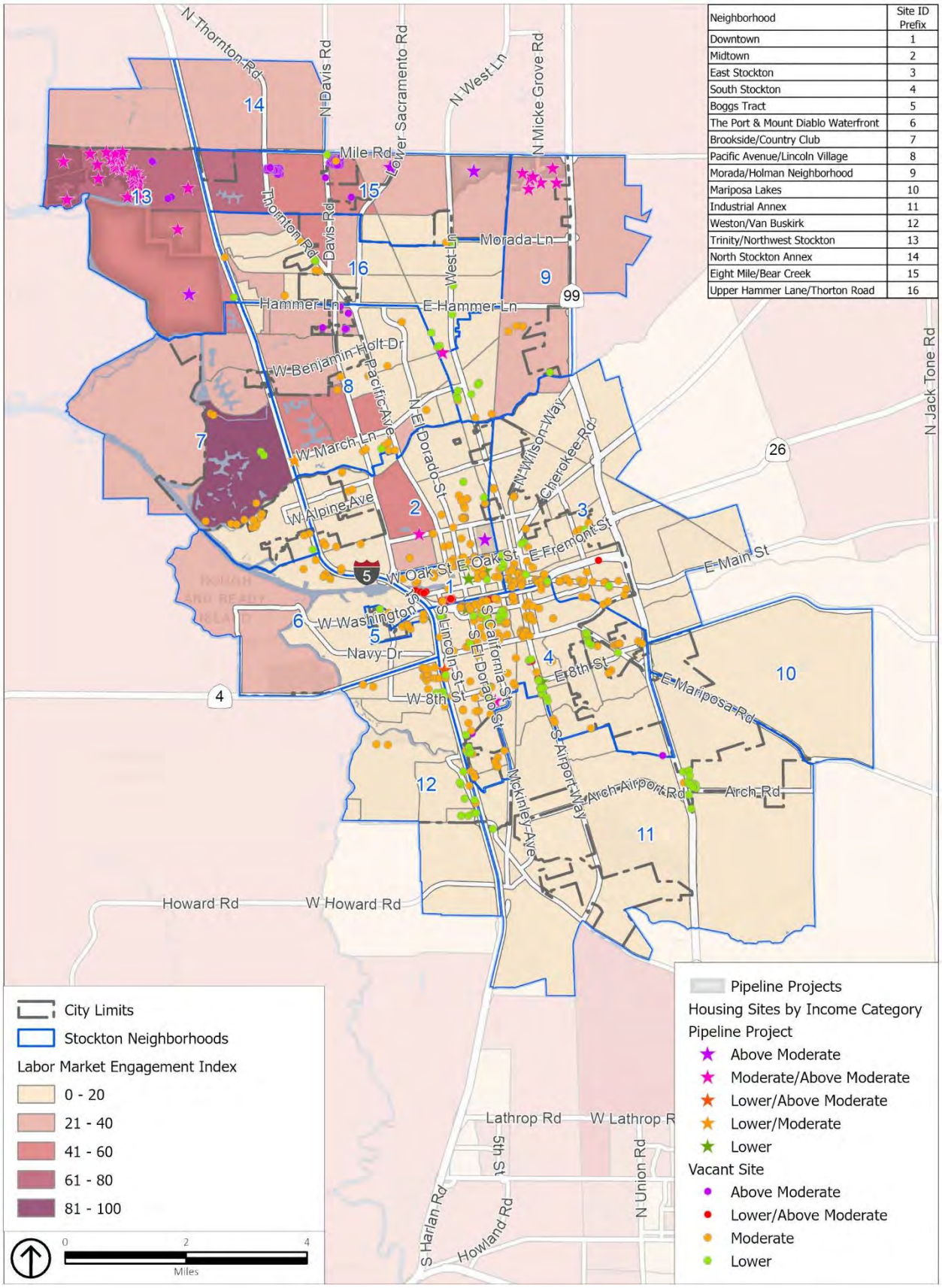
distance commutes southeast to cities along SR-99, with concentrations in the cities of Merced, Madera, and Fresno. Only 9.0 percent of Stockton residents travel north-northeast to the Sacramento area.

Slightly over one-half of Stockton residents work in San Joaquin County, and 43.6 percent of Stockton residents live within 10 miles of their place of employment. According to LODES data, 44.5 percent of these workers travel south and southeast of their place of residence; 34.2 percent travel north, northwest, and northeast; 11.9 percent travel to the southwest and west; and 9.3 percent travel east. Because the lineal distance between northern and southern city limits is approximately 15 to 16 miles, this may include either intracity commutes, work-from-home employment, and short commutes from within the city to locations external to city limits. Intracity commutes and work from home account for 34.4 percent of the Stockton workforce; therefore, approximately 9.2 percent of Stockton residents with short commutes work in the vicinity of the city yet outside of the city limits, which could include the airport, expanding industrial facilities south along I-5 toward French Camp, and in developing tracts north and east of the city.

The Labor Market Engagement Index (**Figure HE-12, Local Labor Market Engagement**) depicts the relative intensity of labor market engagement and characteristics of the labor force in a geographical area, typically a census tract. This is based on three factors: unemployment rate; labor force participation rate; and educational attainment (BA degree and higher). The higher the score, the higher the labor force participation and hence potential earnings associated with higher levels of educational attainment. In Stockton, the Labor Market Engagement Index indicates the highest participation rates are in the northwestern residential neighborhoods from the northern boundary of the city to the Calaveras River, and along the northeastern and western edges of the city. The areas of the city with the highest Labor Market Engagement Index (88) include the villages within and north of the Brookside/ Country Club neighborhood, which also correlates to the area with the highest median incomes in the city, over $95,000, as well as TCAC/HCD most positive educational outcomes and the most positive economic outcomes percentile rankings. The census tracts, including the University of the Pacific and Dameron Hospital in the Midtown neighborhood, have labor market participation rates between 35 and 70, correlating to areas with median incomes between $87,100 and $125,000, and TCAC/HCD positive economic outcomes in the 50th to 75th percentile range, although educational outcome domain scores are lower, between the 20th and 60th percentile range. Conversely, the labor market index is lowest in the central and southern portion of the city, within the areas identified as R/ECAPs, and in the northeastern portion of the city, with labor market indices below 10, generally correlating to areas with median incomes below $55,000.

In Stockton, the unemployment rate was approximately 9.7 percent, although this rate reflects the unemployment rate during the height of the COVID epidemic and therefore does not represent the more accurate conditions reported by the US Bureau of Labor Statistics, which is 5.2 percent as of December 2022 (see HNA **Table HE-11, Unemployment Rates**). The unemployment rate closely reflects those found throughout San Joaquin County in 2020, suggesting that residents of Stockton had similar access to employment opportunities during the pandemic. The jobs-household ratio was 1.2 in 2020, indicating that there is a strong balance between jobs and housing; however, this figure could also be reflective of the increase in persons working remotely during the pandemic and reporting their workplace as Stockton. As well, as discussed above, 34.4 percent of the labor force in the city of Stockton is employed in the city itself; conversely 65.6 percent of Stockton residents are employed outside of the city limits, suggesting that while the number of jobs in the city and labor force participation are fairly equivalent, the majority of residents living in the city work outside of the city, and conversely, the majority of jobs available in the city are filled by persons commuting in from other localities.

Figure HE-12: Local Labor Market Engagement



Source: HUD, 2021

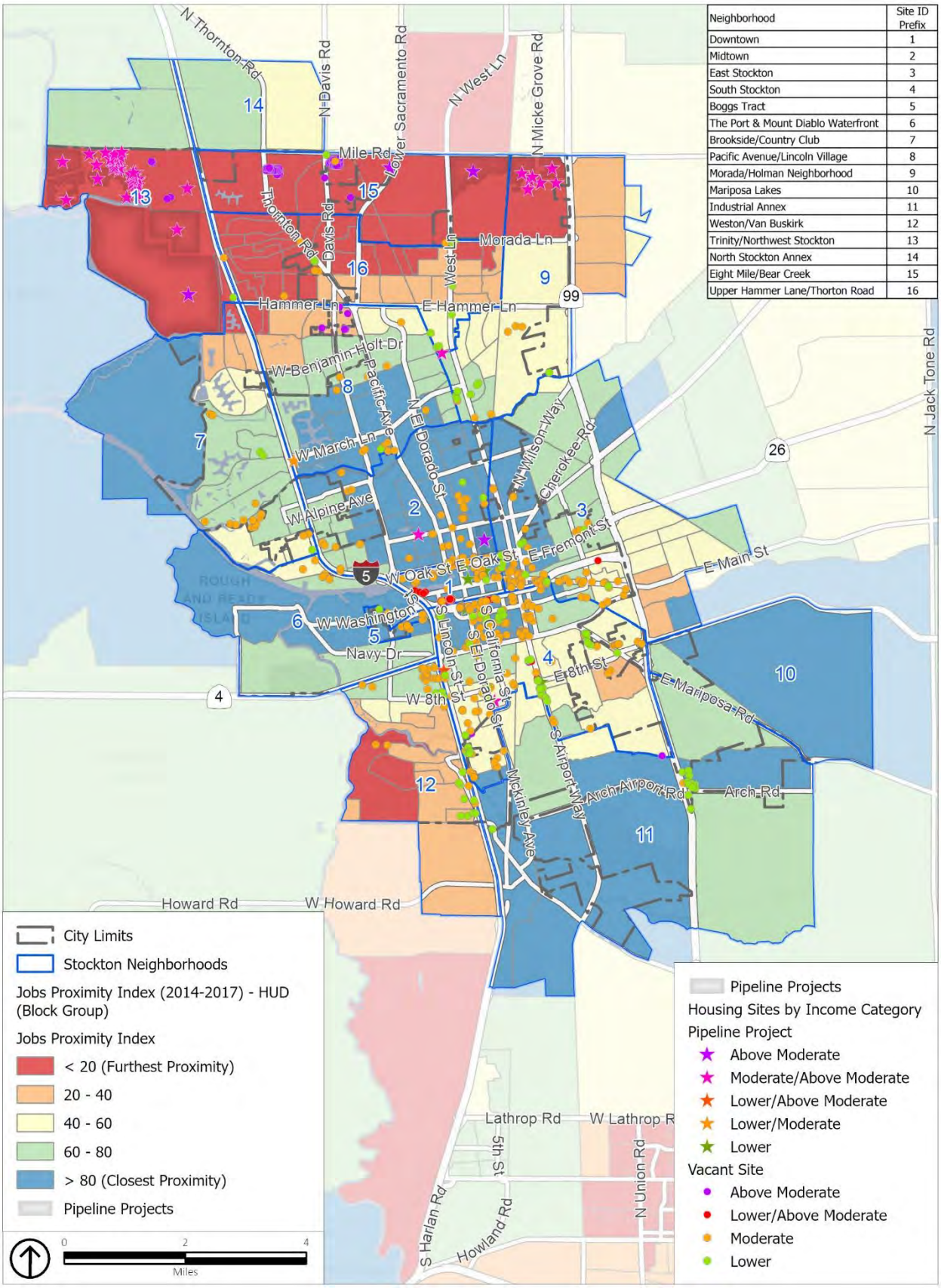
Figure HE-13, Local Jobs Proximity, shows that central Stockton has the closest proximity to jobs, with scores above 90 in the vicinity of Downtown and up to 98 in portions of the Midtown neighborhood. However, many of the census tracts with the higher jobs proximity scores align with those with the lowest employment participation scores, are designated as R/ECAPS, and exhibit rates of poverty 20.0 percent and higher. These areas also generally correlate with TCAC/HCD Educational Outcome and Economic Outcome scores falling below the 25th percentile range, suggesting that while there are many job opportunities in these tracts, the resident population is not filling them. Scores in the northern portion of the city indicate furthest proximity to jobs, falling between the 5th to 15th percentiles, although these same areas reflect market participation index scores ranging between the 43rd and 65th percentile. These areas are predominantly newer residential neighborhoods with incomes among the highest in the city, also corresponding to TCAC/HCD Economic and Educational Outcome Domain scores above the 75th percentile. Based on the employment destination data previously discussed, a portion of residents in these neighborhoods may commute to employment opportunities outside of the city, supporting recent trends of households with higher paying jobs relocating from the Bay area to newer market rate residential developments in Stockton. While Figure HE-13, Local Jobs Proximity, and Figure HE-12, Local Labor Market Engagement, show discrepancies in access to or engagement in labor market opportunities, the unique characteristics of employment opportunities in and near Stockton suggest that these maps may not reflect economic conditions in the city, and that proximity to jobs does not indicate higher economic outcomes, access to resources, or employment engagement. Therefore, although there are employment opportunities associated with upper-level educational facilities throughout the city, and a substantial business and industrial base in the Downtown, South Stockton, and Industrial Annex neighborhoods, providing a variety of employment options available to residents of Stockton, the high rates of residents commuting outside of the city and unemployment rates in sections of the city with concentrations of jobs suggests that access to employment opportunities does pose a fair housing issue because there is not a strong correlation between labor force qualifications and types of employment available in the city.

Regional Trends

Outside of Stockton and communities in its SOI, many of the COG area's highest Labor Market Engagement Index (LMEI) ratings are located in the southern part of the county, including the city of Escalon (52), the majority of the city of Ripon (66 and 60), parts of central Tracy (61 and 63), and the census tract including south Tracy and the unincorporated community of Chrisman (63), indicating higher rates of labor force participation and educational attainment and lower unemployment rates in these communities. However, some unincorporated areas on the south side of the county and areas of central Tracy are also among the lowest-rated areas, indicating wide gaps in these factors within the region. The census tract that includes the communities of Vernalis and New Jerusalem have the lowest possible LMEI score (0) and the adjacent census tract to the east has a score of 15. The tract surrounding Escalon also has a particularly low score of 13. Three census tracts in Tracy have scores of 18, 18, and 15.

On the South side of the County, areas with the highest LMEI rankings were not always correlated with high Jobs Proximity Index (JPI) scores. While the unincorporated block groups including the west and south sides of Tracy and the tract including the unincorporated community of Chrisman had high LMEI scores and JPI scores in the 99th percentile, in the Ripon area the census tract with the highest LMEI rating had the city's lowest JPI score in the 15th percentile. Residents in this area have high participation in the labor force, but likely have to travel farther distances to access jobs, which can add to the cost of living. On Ripon's north side, the community's other higher-scoring area in the LMEI was divided between two block groups, one with a lower JPI in the 27th percentile, and another with a high JPI score in the 84th percentile. The higher-scoring block group is outside of Ripon's city limits, and likely represents a higher concentration of agricultural job opportunities. Similarly, within the city of Escalon, the LMEI ranking was above 50, but two of the three block groups in this area had JPI scores below 10, and the third was in the 30th percentile.

Figure HE-13: Local Jobs Proximity



Source: HUD, 2017

The Mountain House area has a medium LMEI score of 44, but a JPI score of 0. This is indicative of the area's primarily residential nature, with limited commercial or office land uses in close proximity.

The unincorporated community of Woodbridge also has a relatively high score (63), as does the tract in the northeast corner of Lodi (62). These areas have low to medium JPI scores between the 14th and 34th percentile, indicating that many employed residents have to travel longer distances to access employment. Other tracts with high and highest-resource TCAC designations on the west side of Lodi and in the census tracts that include the communities of Acampo and Collierville have medium LMEI ratings between 41 and 54 and JPI scores in the 61st (Acampo), 53rd and 39th percentiles (Collierville). Like the south side of the county, the Lodi area also has significant level of contrast between neighborhoods. Tracts in Lodi's lower-income east side have LMEI scores between 5 and 20, likely indicating a combination of low levels of education attainment and higher rates of unemployment, but medium JPI scores between the 41st and 80th percentiles. The nearby community of Lockeford also has a notably low LMEI score of 19 but medium JPI scores in the 57th and 66th percentile.

Within Manteca and Lathrop, LMEI scores are primarily low to moderate, with each city's central area having its lowest Index scores. Four census tracts in central Manteca have LMEI scores below 10, and two more have scores below 20. However, north Manteca and the adjacent unincorporated area has a score of 46. In Lathrop, two tracts in the central city have scores of 14 and 18, while the rest of the city has more medium LMEI scores between 24 and 35.

Other unincorporated communities to the northwest and east of Stockton have low to medium LMEI scores between 20 and 40. Interestingly, these areas were among the highest-scored in the JPI, likely due to the high availability of agricultural work in these areas.

EDUCATION

Four main school districts serve the city: the Stockton Unified School District (SUSD) has a total of 59 schools in the city reported on by the Department of Education—47 elementary schools, 2 middle schools, 6 high schools, and 4 upper-level alternative schools—and the Lincoln Unified School District serving the Pacific Avenue/Lincoln Village and Brookside/Country Club neighborhoods with a total of 12 schools, including 2 elementary schools, 6 elementary through middle schools (K-8), 1 middle school, 2 high schools, and a charter school. A small number of neighborhoods in the north side of the city are served by the Lodi Unified School District, and some in the south are served by Manteca Unified School District.

Of the 58 schools in the SUSD for which English Language Arts (ELA) and Mathematics performance scores were available in 2021, the Department of Education reported that most of the schools are below the state grade-level standards for ELA and mathematics (see **Table HE-46**). Similar performance statistics exist for the Lincoln Unified School District, although overall scores are generally higher, reflected in the TCAC/HCD educational domain scores above the 50th percentile.

The proportion of each school's population that was considered socioeconomically disadvantaged in 2021 ranged from 40.1 percent at the Kohl Open Elementary to 93.9 percent at Spanos Elementary in the SUSD, and 30.9 percent at Brookside Elementary/Middle School to 76.1 percent at Valley Oaks High School in the Lincoln Unified School District. Although this factor does not consistently correlate with income, there is a general relationship between disadvantaged students, ELA and math standardized scores, and TCAC/HCD Educational Domain scores. Approximately 3.4 percent of schools in the SUSD have less than 50.0 percent disadvantaged students in the student body, and 6.8 percent have 50.0 and 60.0 percent disadvantaged student populations. In comparison, in the Lincoln Unified School District, 25.0 percent of the schools have less than 50.0 percent disadvantaged student populations, and another 25.0 percent have between 50.0 and 60.0 percent disadvantaged student populations. The highest proportion (100.0 percent) of socioeconomically disadvantaged students is at the Dr. Lewis Dolphin Stallworth Sr. Charter School in the Downtown Core of the city.

Overall, within the SUSD there were three schools where 60.0 percent or more of the students had ELA performance scores at or above the standard, all of

which are alternative high school or college preparatory schools in the central Downtown Core area, corresponding to TCAC/HCD educational domain scores above the 75th percentile, with socioeconomically disadvantaged student populations ranging between 55.1 and 75.9 percent. Three schools had between 40.0 to 59.9 percent of the students scoring at or above the standard, with socioeconomically disadvantaged student populations comprising between 47.8 to 72.4 percent of the student body. These schools are east of West Lane in the Morada/Holman neighborhood with TCAC/HCD educational domain scores in the 57th to 85th percentile, with one located downtown, also with a most positive educational outcome percentile score. There is no consistent correlation between median income and higher ELA scores, with median incomes ranging from $12,256 to $85,717. Within the Lincoln Unified School District, there also were three schools where approximately 60.0 percent or more of the students had ELA performance scores at or above the standard, one of which is a charter school and one is Brookside Elementary School in the Brookside Country Club subdivision with a TCAC/HCD educational domain score in the 86th percentile, correlating with the highest median incomes in the city and the lowest proportion of socioeconomically disadvantaged students.

A large proportion of the schools throughout the city and in the SUSD, 49.2 percent, had less than 20.0 percent of students with ELA performance scores at or above the standard. Disadvantaged students comprised between 73.1 and 92.9 percent of the student population, correlating with TCAC/HCD educational domain scores generally below the 50th percentile. The relatively low ELA and math scores among all schools in the Stockton Unified School District, with a few exceptions in the northeast, north, northwest, and downtown area, indicates that students generally have similar access to lower performing schools.

Table HE-46: Performance Scores for Stockton Unified School District
San Joaquin County, 2021-22

SCHOOL NAME	ELA SCORE	MATH SCORE	SOCIO-ECONOMICALLY DISADVANTAGED	FOSTER YOUTH	ENGLISH LEARNERS
Adams Elementary	*11.5%*	*5.9%*	*82.9%*	***7***	***20.0%***
Alexander Hamilton Elementary	*11.3%*	*7.1%*	*91.0%*	***9***	***33.0%***
Aspire APEX Academy	*16.7%*	*10.1%*	*77.5%*	***5***	***14.7%***
Aspire Langston Hughes Academy	*31.8%*	*19.2%*	*72.2%*	***5***	***10.6%***
Aspire Rosa Parks Academy	*13.5%*	*8.9%*	*88.9%*	***2***	***4.8%***
August Elementary	*15.5%*	*7.4%*	*93.0%*	***5***	***39.8%***
Cleveland Elementary	*17.6%*	*11.6%*	*87.9%*	***14***	***21.8%***
Commodore Stockton Skills	*37.2%*	*29.9%*	*57.4%*	***1***	***4.4%***
Dolores Huerta Elementary	*14.7 %*	*5.1%*	*92.9%*	***23***	***34.0%***
Dr. Lewis Dolphin Stallworth Sr. Charter	*13.5%*	*6.8%*	*100.0%*	***3***	***53.1%***
El Dorado Elementary	*12.7 %*	*9.0%*	*91.5%*	***15***	***18.6%***
Elmwood Elementary	*21.2%*	*9.5%*	*81.8%*	***2***	***30.3%***
Fillmore Elementary	*17.6%*	*6.8%*	*87.9%*	***5***	***33.7%***
Flora Arca Mata	*26.4%*	*18.3%*	*N/A*	***4***	***13.9%***
George W. Bush Elementary	*23.9%*	*13.8%*	*75.7%*	***8***	***16.2%***
George Washington Elementary	*19.9%*	*12.2%*	*85.0%*	***7***	***37.6%***
Grunsky Elementary	*16.3%*	*11.5%*	*89.2%*	***--***	***16.1%***
Hazelton Elementary	*18.2%*	*5.7%*	*91.6%*	***10***	***32.7%***
Harrison Elementary	*20.0%*	*9.5%*	*80.0%*	***7***	***33.5%***
Hoover Elementary	*12.6%*	*8.4%*	*73.3%*	***4***	***16.7%***

SCHOOL NAME	ELA SCORE	MATH SCORE	SOCIO-ECONOMICALLY DISADVANTAGED	FOSTER YOUTH	ENGLISH LEARNERS
John C. Fremont Elementary	14.3%	7.0%	85.2%	9	38.2%
John Marshall Elementary	10.6%	7.5%	73.1%	9	23.9%
Kennedy Elementary	15.8%	13.7%	74.5%	11	23.7%
King Elementary	17.5%	11.7%	89.5%	14	40.3%
Kohl Open Elementary	26.9%	15.9%	40.1%	--	5.3%
Madison Elementary	16.6%	8.2%	78.6%	10	18.1%
Maxine Kong Kingston Elementary	21.6%	11.9%	72.2%	6	16.8%
McKinley Elementary	13.6%	7.7%	87.7%	9	48.1%
Monroe Elementary	14.3%	6.0%	85.7%	9	34.5%
Montezuma Elementary	20.2%	14.3%	83.3%	8	38.4%
Nightingale Charter	28.1%	21.0%	86.8%	2	22.5%
Pittman Charter	25.5%	15.5%	89.2%	1	41.0%
Pulliam Elementary	18.1%	8.1%	80.6%	9	8.2%
Rio Calaveras Elementary	45.4%	29.3%	72.4%	3	19.2%
Roosevelt Elementary	19.3%	10.8%	89.1%	8	37.3%
San Joaquin Elementary	30.4%	19.2%	68.4%	12	24.2%
Spanos (Alex G.) Elementary	20.4%	14.7%	93.9%	6	45.6%
Stockton Collegiate International Elementary	29.1%	23.2%	57.7%	--	15.4%
Taft Elementary	21.7%	12.5%	84.5%	10	30.4%
Taylor Leadership Academy	15.1%	5.1%	85.7%	10	21.3%
TEAM Charter	25.9%	4.5%	89.8%	9	24.1%
Valentine Peyton Elementary	51.6%	40.1%	57.7%	8	12.6%
Van Buren Elementary	11.2%	7.2%	92.9%	5	29.2%
Victory Elementary	22.5%	13.4%	85.7%	14	14.8%
Walton Development Center	--	--	--	5	33.7%
Wilhelmina Henry Elementary	19.6%	9.4%	88.6%	3	42.6%
Wilson Elementary	15.6%	14.1%	80.6%	5	16.6%
Aspire Stockton Secondary Academy	32.1%	15.5%	--	--	14.6%
Stockton Collegiate International Secondary	47.2%	17.9%	47.8%	--	13.6%
Cesar Chavez High	42.0%	11.9%	69.2%	24	15.4%
Edison High	33.0%	5.1%	81.8%	31	23.9%
Edward C. Merlo Institute of Environmental Studies	33.9%	13.6%	93.1%	2	26.9%
Franklin High	32.8%	12.8%	79.6%	9	25.0%
Health Careers Academy	66.3%	16.3%	70.0%	1	10.1%
Jane Fredrick High	5.6%	0%	85.2%	5	26.1%
Stagg Senior High	38.6%	6.3%	70.4%	81	33.3%
Stockton Senior High	18.2%	0%	--	4	9.9%
Weber Institute	65.3%	15.8%	75.9%	2	8.6%
Stockton Early College Academy	98.1%	67.0%	55.1%	--	1.8%

Source: California Department of Education, 2021, accessed 11/2022.

Table HE-47: Performance Scores for Lincoln Unified School District

San Joaquin County, 2021-22

SCHOOL	ELA	MATH SCORE	SOCIO-ECONOMICALLY DISADVANTAGED	FOSTER YOUTH	ENGLISH LEARNERS
Brookside Elementary/Middle School	*69.2%*	*58.5%*	*30.9%*	*<10*	*7.8%*
Claudia Landeen Elementary/Middle School	*31.0%*	*18.4%*	*73.9%*	*<10*	*16.7%*
Colonial Heights Elementary/Middle School	*31.9%*	*19.2%*	*69.9%*	*<10*	*10.7%*
Don Riggio Elementary/Middle School	*27.6%*	*15.4%*	*58.6%*	*<10*	*20.2%*
Lincoln Elementary School	*35.6%*	*27.9%*	*73.9%*	*<10*	*15.7%*
John R. Williams Elementary	*28.3%*	*18.7%*	*64.9%*	*<10*	*14.5%*
Mable Barron Elementary/Middle School	*38.3%*	*25.1%*	*55.1%*	*<10*	*10.0%*
John McCandless Charter School	*68.5%*	*45.1%*	*35.1%*	*<10*	*4.4%*
Sierra Middle School	*51.7%*	*16.6%*	*55.1%*	*<10*	*9.8%*
Tully C. Knoles Elementary/Middle School	*39.3%*	*19.7%*	*71.9%*	*<10*	*16.7%*
Lincoln High School	*59.5%*	*25.0%*	*48.2%*	*<10*	*9.5%*
Village Oaks High School	*18.2%*	*0%*	*76.1%*	*<10*	*17.9%*

Source: California Department of Education, 2021, accessed 2022.

The anticipated educational outcome is a measure of several factors, including:

- students' individual abilities
- quality of schools attended, and
- family backgrounds

These factors are correlated with:

- proficiency on standardized tests
- high school graduation rates, and
- student poverty indicators (sociologically disadvantaged)

The results of this analysis can identify potential for higher levels of educational achievement such as high school graduation and college attendance, preparation for the workforce and associated long-term improvements in earnings, health and upward mobility, reductions in prejudice and negative attitudes across racial groups, and even risk of disciplinary action. According to TCAC and HCD, anticipated educational outcome varies throughout the city (**Figure HE-14, Local TCAC/HCD Educational Domain Score**). In Stockton, the highest expected educational outcome, above the 80th percentile, is expected in the Brookside Country Club, Trinity/Northwest Stockton, Eight Mile/Bear Creek, Morada/Holman, and portions of Pacific Avenue/Lincoln Village neighborhoods in the San Joaquin Delta College and adjacent Venetian Park residential areas, and within the Downtown. Areas with above moderate expected educational outcomes between the 59th and 73rd percentiles are found in the northern central residential subdivisions and southern edge of the Pacific Avenue/Lincoln Village neighborhood, within the Midtown neighborhood adjacent to University of the Pacific, and the southwest corner of the Morada/Holman neighborhoods.

The lowest expected educational outcome, according to TCAC and HCD, is found in two major areas of the city. The largest area includes South Stockton, East Stockton, Weston/ Van Buskirk, and Industrial Annex neighborhoods, where scores are below the 20th percentile. The schools in this area (Edward Merlo Institute, Franklin High, Cezar Chavez High, and Nightingale Charter are the exceptions) generally reflect performance scores below 20.0 percent of meeting the state ELA standard and lower scores for math proficiency, as presented in **Table HE-47.**

Some northern areas of the city, where TCAC education domain scores indicate more positive educational outcomes, are within the Lodi Unified School District (LUSD) catchment area. Within the Lodi Unified School District, 71.9 percent of students are considered socioeconomically disadvantaged as of 2021, which is representative of conditions within the City of Lodi, and 20 percent of students are English language learners.

Of the schools in the Lodi Unified School District, 23 are located within Stockton city limits. As of 2022, English Language Arts scores district wide are considered low, and were 32.6 points below standard. In math, students are 69.4 points below standard. LUSD schools located within Stockton tend to follow this trend of low or very low ELA and math scores, with several exceptions. Elkhorn School, which serves grades 4-8, has very high scores in both ELA and Math, as does Middle College High. John Muir Elementary has medium math scores and high ELA scores, as does Manlio Silva Elementary.

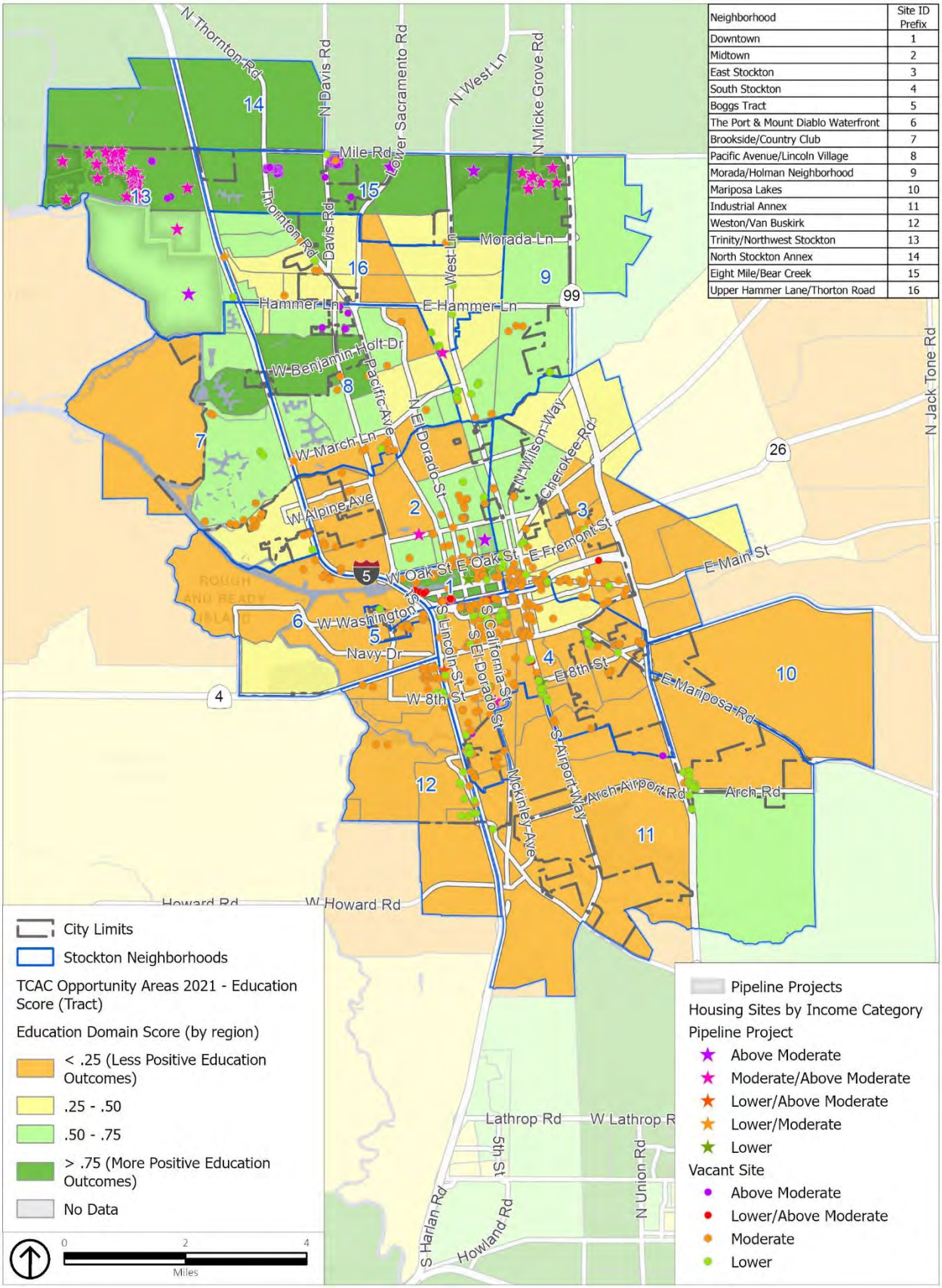
On the south side of the city, where TCAC education domain scores indicate less positive educational outcomes, several neighborhoods are served by the Manteca Unified School District (MUSD). The Manteca-Lathrop area is considered to have more positive education outcomes according to the TCAC Education Domain score. As of 2021, 67.7 percent of students in the district as a whole are considered socioeconomically disadvantaged, and 20.3 percent are English language learners. The district has a high graduation rate, including Weston Ranch High, which is located in Stockton. Of the schools in the Lodi Unified School District, 5 are located within Stockton city limits, including New Vision High, which is an alternative school. The four other schools within Stockton city limits tend to have low or very low ELA and mathematics scores as of 2022.

To identify whether housing instability impacts school performance, particularly in areas in which the schools have a high proportion of socioeconomically disadvantaged students, and to ensure students are able to live and work in Stockton, the City has included Program 31 to pursue solutions.

Regional Trends

Many in the COG with the most positive educational outcomes as of TCAC's 2021 assessment are areas served by the Manteca and Ripon Unified School Districts, as well as the Lammerville Joint Unified School District, which includes the Mountain House and Lammerville unincorporated communities, and Banta Unified School District, which serves the unincorporated communities of Banta and Stoneridge. In both the Tracy and Escalon areas, educational outcomes are more divided in loose correlation with median household income levels, where higher-income areas of the community tend to have more positive educational outcomes and lower-income areas tend to have less positive educational outcomes. This may be related to higher numbers of English Language Learners or households with fewer financial resources to engage in extracurricular academic assistance such as tutoring. Within areas served by the Linden Unified School District, educational outcome scores are in the two quartiles with the least positive educational outcomes.

Figure HE-14: Local TCAC/HCD Educational Domain Score



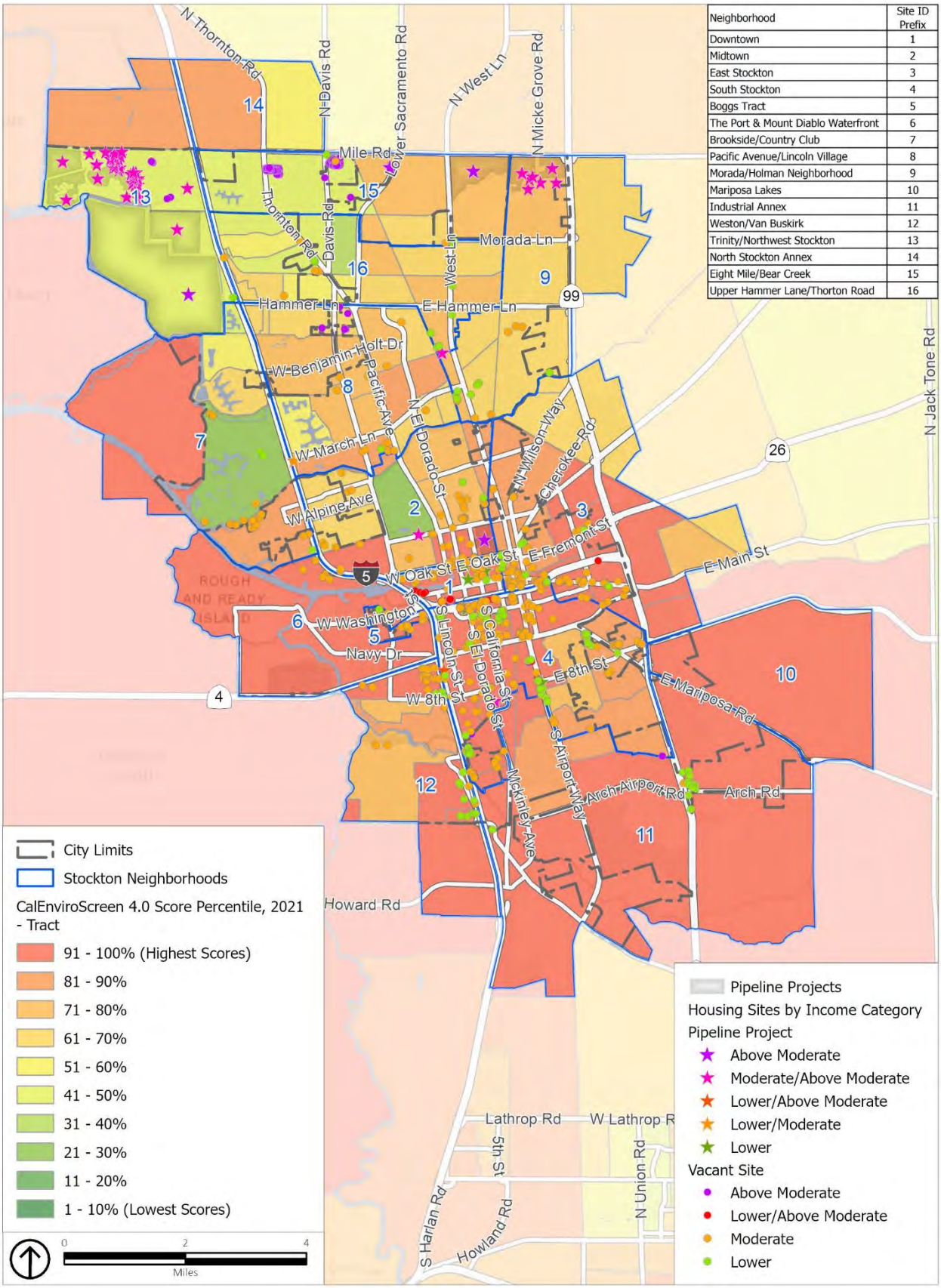
Source: TCAC/HCD, 2021

ENVIRONMENTAL HEALTH

A disadvantaged community or environmental justice community (EJ Community) is identified by the California Environmental Protection Agency as "areas that are disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation," and may or may not have a concentration of low-income households, high unemployment rates, low homeownership rates, overpayment for housing, or other indicators of disproportionate housing need. In February 2021, the California Office for Environmental Health Hazard Assessment released the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map and compare community environmental scores. In the CalEnviroScreen tool, communities that have a cumulative score in the 75th percentile or above (25.0 percent highest score census tracts) have been designated "disadvantaged communities" under Senate Bill (SB) 535. Cumulative scores are calculated using the individual scores from two groups of indicators: Pollution Burden and Population Characteristics. Pollution Burden scores exposure to negative environmental hazards, such as ozone and $PM_{2.5}$ concentrations, drinking water contaminants, lead risk from housing, traffic impacts, and more. Population Characteristics scores the rate of negative health conditions and access to opportunities, such as asthma, cardiovascular disease, poverty, unemployment, and housing cost burden. For each indicator, as with the cumulative impact, a low score reflects positive conditions.

As shown in **Figure HE-15, CalEnviroScreen Percentiles,** the primary indicators leading to the low scores outside of city limits to the south and west, as reported by CalEnviroScreen, are pesticides, groundwater threats, hazardous waste, impaired waters, and solid waste. Since most of this area is agricultural land, these conditions are not surprising, and measures have been taken to reduce impacts to residents of Stockton. The distribution and locations of EJ communities across Stockton, the San Joaquin Valley, and the nation are likely caused by numerous factors, including historical planning decisions, such as freeway construction that disrupted or harmed certain communities and redlining practices that resulted in disproportionate mortgage lending across the nation. In Stockton, the areas with the highest rate of environmental pollution and poverty are adjacent to major thoroughfares, including I-5 and SR-4, the Port of Stockton, and concentrated industrial uses. Cities commonly have the highest-density and intensity of uses in their core, and this aligns with areas of the greatest number of potential fair housing issues in Stockton. Within the city, the higher scores in the central and southern portions are based on both population characteristics and pollution burden ranging from the 92nd to 99th percentile for CalEnviroScreen. This area also qualifies as a disadvantaged community; there is a significant concentration of poverty, low rates of educational attainment, and a high rate of unemployment, corresponding to several census tracts designated by TCAC/HCD as Areas of High Segregation and Poverty and by HUD as R/ECAPs. As well, these areas are subject to increased exposure to pesticides, hazardous waste, and toxic waste cleanup; groundwater threats and drinking water contaminants; pollution and particulate matter from major transportation corridors, railroad yards, and airport operations; and lead in housing in older neighborhoods, depending on the location of the compromised neighborhoods. Though all of these factors may not be experienced in all neighborhoods in central and southern Stockton, they do represent a significant concern in terms of fair housing because of disproportionate exposure to environmental hazards and a concentration of vulnerable populations.

Figure HE-15: CalEnviroScreen Percentiles



Source: California Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0, 2021.

TCAC/HCD Environmental Domain percentiles closely correspond (inversely) to CalEnviroScreen scores. According to TCAC/HCD Environmental Domain scores, the majority of the Eight Mile/Bear Creek and eastern portion of the Upper Hammer Lane/Thornton Road neighborhoods and portions of the Morada/Holman neighborhood (excepting the easternmost tracts, which also include agricultural land in the unincorporated area) have positive environmental scores ranging from the 82nd to 95th percentiles. The majority of the Weston/Van Buskirk neighborhood (Weston Ranch portion) also has high environmental domain scores in the 83rd and 88th percentiles. However, the Walter Slough area, including the Sierra Vista-Conway public housing in the center of this neighborhood, scores in the 33rd percentile. The developed portion of the Trinity/Northwest Stockton, the Brookside/Country Club (with the exception of the older Stockton Golf and Country Club villages within an unincorporated island), and western portion of the Upper Hammer Lane/Thornton Road neighborhoods as well as the central and eastern portions of the Pacific Avenue/Lincoln Village neighborhood generally have favorable environmental domain scores, between the 50th and 75th percentiles. As well, the greater part of the Midtown neighborhood has positive TCAC/HCD environmental domain scores. Lower environmental domain scores are generally found on the east side of I-5 in the Pacific Avenue/Lincoln Village neighborhood.

The area between West Elm and West Park Streets adjacent to the Greater Downtown area and the Downtown, East Stockton, Industrial Annex, and South Stockton neighborhoods have environmental domain scores that range from the 23rd percentile to below the 1st percentile in the district including the Stockton Ballpark, Stockton Arena, and Weber Point Events Center. This lowest scoring area includes the Port of Stockton along the San Joaquin River, Rough and Ready Island, downtown Stockton, industrial and other nonresidential uses, older residential neighborhoods, and industrial areas east of the Union Pacific Railroad and south of Duck Creek, to the southern boundary of the city adjacent to the Stockton Municipal Airport. (**Figure HE-16, TCAC/HCD Environmental Domain**). The City has included Program 31 to reduce these issues.

Regional Trends

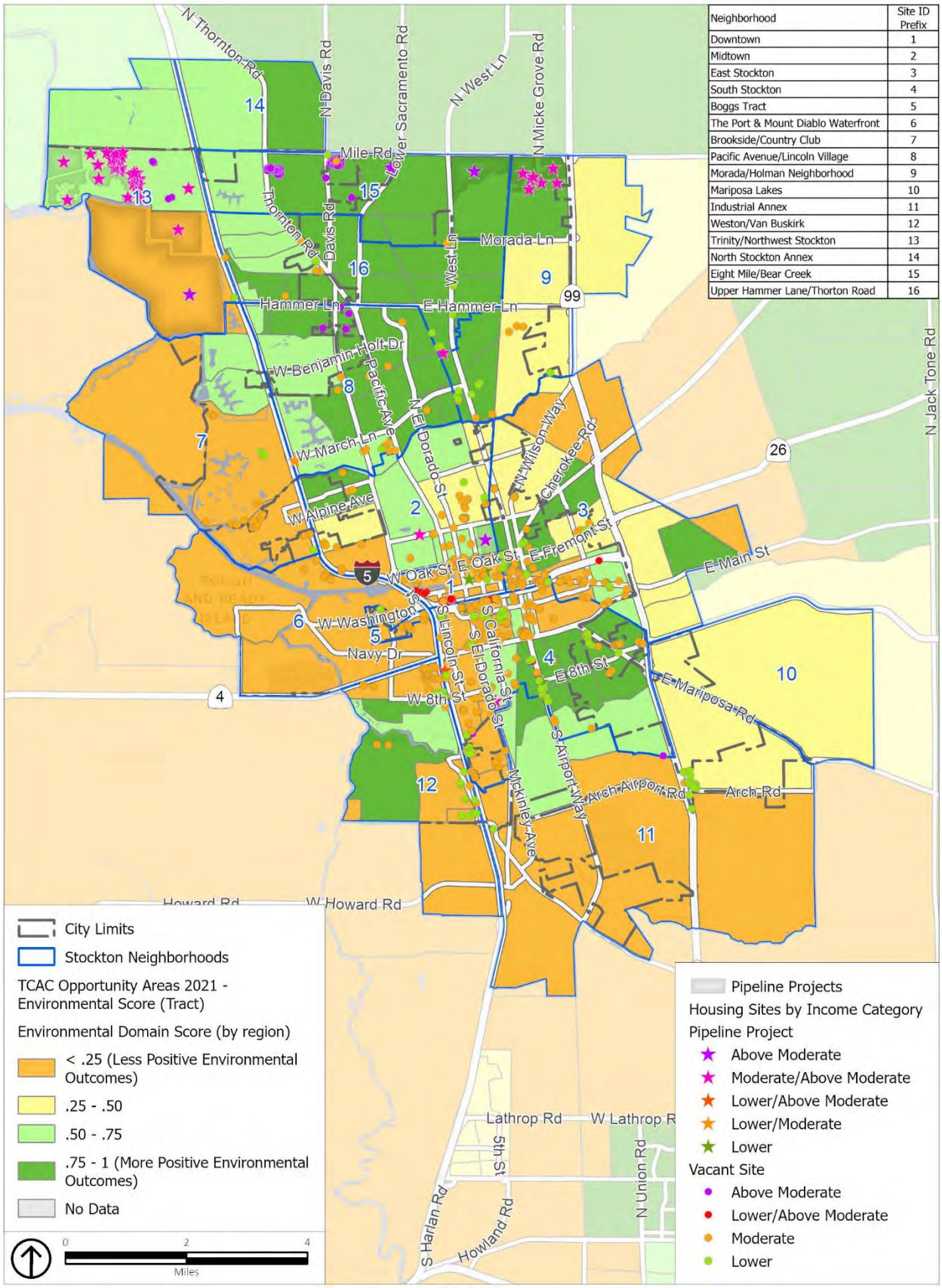
Because CalEnviroScreen scores are weighted heavily by socioeconomic factors, and TCAC's ratings are focused primarily on environmental conditions alone, some areas with socioeconomically disadvantaged populations are rated as having higher scores (associated with less positive outcomes) under the CalEnviroScreen system than they are under the TCAC evaluation, which focuses solely on environmental factors.

Areas on the west side of the county, north of Mountain House and including the Thornton unincorporated community are all considered disadvantaged communities under SB 535. Factors that contributed to high scores in these areas include impaired waters, groundwater threats, drinking water quality, poverty and unemployment. In TCAC's assessment, the Thornton area had a significantly more positive environmental score in the 73rd percentile, while the areas just east of Stockton scored between 0 and the 15th percentile.

Mountain House and much of the Tracy area have medium CalEnviroScreen scores in the 40th through 60th percentile range, with some areas in central Tracy having lower scores and the north side of Tracy and unincorporated area near Banta and Stoneridge having higher in the 61st to 75th percentile range. However, scores on the north side of Tracy and the unincorporated area south may have been strongly influenced by socioeconomic factors, because within the TCAC assessment method, central and north Tracy scores are primarily in the most positive quartile, while the largely unincorporated area south of Tracy has a score in the 2nd most positive percentile.

This socioeconomic weighting may have also come into play in the Ripon and Escalon areas. Under the CalEnviroScreen assessment standard, Ripon's tracts have scores between the 49th and 52nd percentiles, while their TCAC environmental scores are between the 3rd and 30th percentiles, a significantly less positive score. Similarly, in Escalon the city scores in the 58th percentile under the CalEnviroScreen system, but in the 9th percentile under the TCAC scoring system.

Figure HE-16: TCAC/HCD Environmental Domain



Source: TCAC/HCD, 2021

The majority of the Lathrop area is also considered a disadvantaged community under SB 535, as are unincorporated areas to the east of Manteca. On the east side of Manteca, hazardous waste, drinking water quality, and pesticide exposure are central contributing factors in this rating. Drinking water contaminants, groundwater threats, cleanup sites, hazardous and solid wastes, and pesticides were also identified as concern ins the areas in and around Lathrop. Much of the Manteca and Lathrop areas had TCAC environmental scores that were similarly less positive, each scoring in the least positive quartile, though central Lathrop had scores in the second-least positive quartile and several areas in central Manteca had scores in the most positive quartile.

The east side of Lodi is also considered a disadvantaged community under SB 535. In this area, the highest-scoring issues were socioeconomic, including poverty, unemployment, linguistic isolation, and low education attainment. Because its CalEnviroScreen score was weighted heavily by its socioeconomic scores, where TCAC's ratings are focused primarily on environmental conditions alone, much of Lodi had more positive ratings, with the majority of scores in the highest quartile.

Areas of San Joaquin County with the lowest CalEnviroScreen scores include parts of the Woodbridge community, the Dogtown area and part of the Clements community. These areas also have TCAC environmental scores in the most positive two quartiles.

DISPROPORTIONATE HOUSING NEED AND DISPLACEMENT RISK

OVERCROWDING

Overcrowding occurs when the number of people living in a household is greater than the home was designed to hold. The U.S. Census Bureau considers a household overcrowded when there is more than one person per room, excluding bathrooms, hallways, and kitchens, and severely overcrowded when there are more than 1.5 occupants per room. A typical home might have a total of five rooms that qualify for habitation under this definition (three bedrooms, living room, and dining room). If more than five people were living in the home, it would be considered overcrowded. Overcrowding is strongly related to household size, particularly for large households, and the availability of suitably sized housing. A small percentage of overcrowded units is not uncommon, and often includes families with children who share rooms or multi-generational households. However, high rates of overcrowding may indicate a fair housing issue resulting from situations such as two families or households occupying one unit to reduce housing costs (sometimes referred to as "doubling up"). Situations such as this may indicate a shortage of appropriately sized and affordable housing units as overcrowding is often related to the cost and availability of housing and can occur when demand in a jurisdiction or region is high.

As shown in Table HE-15, Overcrowding, in the HNA, 9.3 percent of households in Stockton are considered overcrowded, which is higher than countywide rate of 5.6 percent, and higher than the state as a whole at 8.2 percent. Of these households in Stockton, 72.0 percent are considered overcrowded, and 28.0 percent are considered severely overcrowded. In Stockton, overcrowding is more common among renters, with renters comprising 78.7 percent of all overcrowded households. This pattern is also seen in the county and the state. Approximately 12.4 percent of renters in Stockton experience some level of overcrowding compared to 6.1 percent of homeowners, with 8.9 percent of renters overcrowded and 3.5 percent severely overcrowded; compared to 4.3 percent of homeowners in overcrowded conditions and 1.7 percent of homeowners in severely overcrowded conditions.

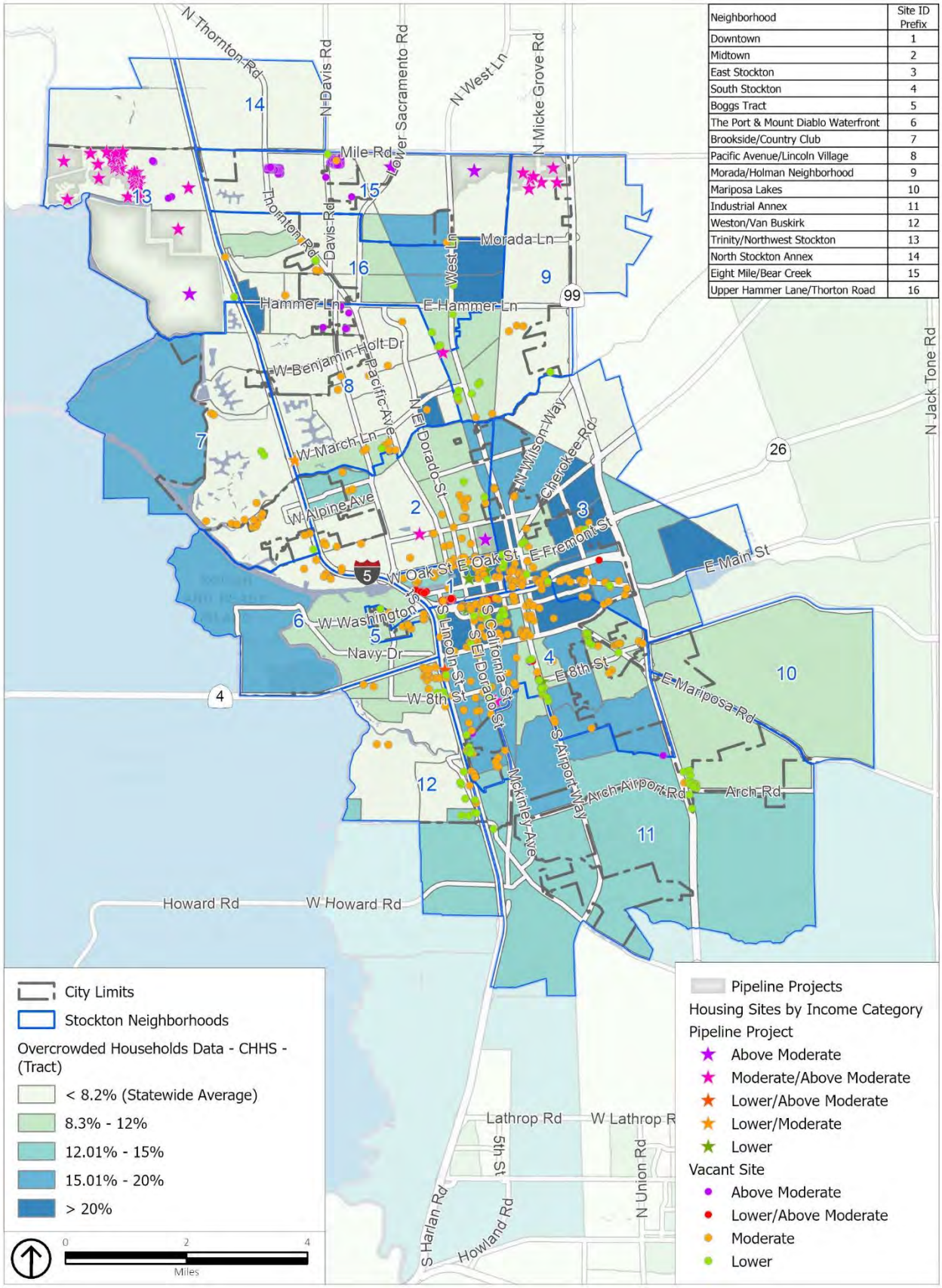
According to the 2014-2018 CHAS, of renters in overcrowded conditions, approximately 24.3 percent fall into the extremely low-income category, 29.2 percent are very low income, 33.4 percent are low income, and 13.0 percent are median income. The incidence of overcrowding among homeowners shows a different pattern—approximately 6.3 percent fall into the extremely low-income category, 11.5 percent are very low income, 42.4 percent are low income, and 39.9 percent are median-income, which suggests that, though some households may be able to purchase a home in Stockton, they cannot afford one that meets the

size needs of the household. Overall, households experiencing overcrowding in Stockton, particularly renter households, when combined with income or accessibility challenges, may become at risk for displacement.

Stockton is a racially and ethnically diverse city, as discussed in the "Racial and Ethnic Characteristics" section. As discussed previously, most block groups in the southern portion of the city have non-White populations of at least 60.0 percent, though in the northern portion of the city are concentrations of census tracts with lower diversity west of Lower Sacramento Road, between Thornton Road /Pacific Avenue and I-5 (inclusive of a large unincorporated county island), west of I-5, and surrounding the University of the Pacific campus. Overcrowding often impacts lower-income households disproportionately. These patterns are reflected geographically, with higher rates of overcrowding generally in areas with lower median incomes and/or concentrations of racial or ethnic populations (Figure HE-17, Overcrowded Households in Stockton). North of the Calaveras River, the majority of census tracts with overcrowding rates exceeding the state average of 8.2 percent correspond with locations of affordable housing resources, TCAC/HCD Area of High Segregation and Poverty, and R/ECAP designations. However, the relationship between diversity, proportion of non-White populations, income, tenure, and overcrowding seen in many other jurisdictions in the county—and even between the northern and southern portions of the city—is not consistently apparent in Stockton. Many of the residential subdivisions within the Upper Hammer Lane/Thornton Road and Pacific Avenue/Lincoln Village neighborhoods concentrated between the Union Pacific Railroad Fresno Subdivision line and Lower Sacramento Road/Pacific Avenue with the highest diversity indexes, low to moderate incomes, and presence of affordable housing resources are not reported as areas of significant overcrowding.

Two of the three census tracts with overcrowding rates above 20.0 percent of households—in the Upper Hammer Lane/Thornton Road neighborhood between the Union Pacific Railroad Sacramento subdivision line and the Union Pacific Railroad Fresno subdivision line from the northern boundary to East Hammer Lane—are not identified as a R/ECAP or Area of High Segregation and Poverty. They do not coincide with the location of an affordable multifamily complex and include block groups that fall in the moderate-income range for San Joaquin County. These neighborhoods consist of single-family residences, the Imperial Stockton Mobile Home Estates, Friendly Village Mobile Home Park, and Pines Mobile Estates, and a variety of multifamily residences. Both census tracts consist of a diverse mix of residents above the diversity index 85th percentile, have predominantly Asian populations with a representation of Black and African American residents exceeding the overall citywide average, and proportions of Hispanic residents at or just below the citywide average. A stakeholder in the outreach process noted that the homeless counts among the Asian population may be underrepresented because families often share responsibility to shelter the homeless (which the stakeholder termed "couch surfing"), which can result in overcrowding. This may also be a practice among Hispanic households. Culturally, Asian and Hispanic households often tend to support extended families regardless of income level. This suggests that the tradition of sheltering homeless and extended family composition in areas with high diversity scores may contribute to rates of overcrowding above the state average in census tracts with primarily higher income levels. The differential in incomes and non-White population distribution by block groups may further assist in spatially identifying the location of households in the overall census tract experiencing higher rates of overcrowding.

Figure HE-17: Overcrowded Households in Stockton



Source: California Health and Human Services, 2021.

The third census tract with an overall overcrowding rate of 21.2 percent is in the Dorchester residential area along I-5, comprising a block group north of Hammer Drive in the Upper Hammer Lane/Thornton Road, and a block group south of Hammer Drive within the Pacific Avenue/Lincoln Village neighborhood. Both block groups exhibit a very diverse mix of residents, with a roughly equal proportion of Hispanic households at 37.0 percent; Black and African American populations comprising 23.6 and 14.5 percent respectively above and below Hammer Lane; and Asian residents at 19.9 to 25.4 percent respectively above and below Hammer Lane. Renter households comprise 74.5 percent above Hammer Lane where higher density multifamily residential and nonresidential uses are prevalent, and 61.7 percent below Hammer Lane, which is lower density multifamily and single-family residential with limited nonresidential uses. Although the median income above Hammer Lane is $34,500 and below Hammer Lane is $66,563, if the pattern of overcrowding among moderate-income Asian households applies within this census tract, it is likely the overcrowded households may be more heavily concentrated south of Hammer Lane.

Areas within the Midtown neighborhood with an incidence of overcrowding above the state average are generally to the east, west, and north surrounding the University of the Pacific campus, although these tracts are primarily designated by TCAC/HCD as moderate and high resource with median incomes in the low- to moderate-income range. The higher rates may be partially attributed to students residing in the vicinity who may be doubling up in bedrooms. Within the upper East Stockton neighborhood, 16.0 percent of households report overcrowded conditions in the highly diverse El Pinal community. The tract is a mix of industrial and railroad-oriented operations—older single-family residential uses at the southern end and newer residential subdivisions at the northern end. There are no affordable housing complexes, and the tract is designated low resource. However, potentially in relation to the newer housing stock in the northern and eastern edges of this census tract near SR-99, the median income is $61,737, falling within the moderate-income category. Although it is difficult to identify spatially where the overcrowding is most prevalent, it may occur more frequently in the southern portion, where older housing stock conditions and typology exist and are intermixed with nonresidential uses.

The portion of the city south of East Harding Way and Cherokee Road, inclusive of the Greater Downtown neighborhoods, sees rates of overcrowding above the state average, generally corresponding with TCAC/HCD designations of Areas of High Segregation and Poverty and HUD R/ECAPs, diversity index scores above the 85th percentile, and historically redlined locales, with a few exceptions. The census tracts with rates of overcrowding exceeding 20.0 percent are in the Greater Downtown, with the highest rate (29.5 percent) in the census tract between Union Avenue and North Wilson Way in the East Stockton neighborhood, where older housing stock, originally constructed to serve the railroad industry, is mixed with industrial and other nonresidential uses. In contrast, the census tract in the Weston/Van Buskirk neighborhood corresponding to the 100 Sierra Vista Conway Homes public housing units, with a median income between $20,104 and $38,359, a TCAC/HCD Area of High Segregation and Poverty designation, 71.9 percent of the residents are renters, and both Asian and Black or African American proportions exceeding the citywide average, has an overcrowding rate of only 4.6 percent, similar to the other tracts in this geographic neighborhood with Moderate and Low resource designations. The availability of 30 three-bedroom and 18 four-bedroom units in the public housing development may be a factor in the low overcrowding rate in this tract.

While some households reported as overcrowded may have chosen to double up inhabitants in one room, and therefore the condition may not be based on inability to find and secure adequate housing, severe overcrowding, particularly among the lower-income households in Stockton, may indicate a more significant potential for displacement. Most noteworthy with respect to overcrowding is the increasing number of households reporting severe overcrowding conditions, from 1.2 percent of total households in 2012 to 2.6 percent in 2020. Renter households have experienced the largest increase in severely overcrowded conditions, from 1.3 percent in 2012 to 3.5 percent in 2020. This risk of displacement applies to both owners and renters in the city, the county, and the state and is a sign that

households are having difficulty finding affordable housing suitable for their size.

The availability of housing units in Stockton appropriate to house lower-income large families (five or more persons) within their affordability level may also contribute to overcrowding. The incidence of large-family households in Stockton, presented in HNA **Table HE-16, Household Size by Tenure**, is higher than in San Joaquin County at 21.2 percent of households compared to a countywide representation at 19.6 percent, and higher than the 13.8 percent throughout the state. In comparison to other jurisdictions in San Joaquin County, the City of Stockton is fairly similar to Tracy, the second largest city in the county, in which 20.9 percent of households have five or more persons, and in contrast with the adjacent smaller cities of Lodi to the north and Manteca to the south, with 14.2 and 18.2 percent of households, respectively, having five or more persons. In Stockton, the distribution of large households by tenure generally aligns with the overall tenure distribution of 49.9 percent homeowners and 50.1 percent renters, with 48.2 percent of large households being homeowners, and 51.8 percent renters. In comparison, 54.8 percent of large households in the county are homeowners, and 45.2 percent are renters, and 55.4 percent of large households in the state are homeowners, and 44.6 percent are renters. This pattern of a slightly higher proportion of large-household renters and a slightly lower representation of large-household homeowners than overall tenure distribution is also found in surrounding jurisdictions in the county.

To meet the needs of large families in Stockton, 63.8 percent of the housing stock has three or more bedrooms. Approximately 66.6 percent of these larger units are owner occupied, comprising 85.2 percent of all of the homeownership stock. Of the total rental stock in Stockton, 42.5 percent of the units have three or more bedrooms, which is 33.3 percent of total larger units in the city. An October 2022 survey of rental listings in Stockton, shown in the HNA **Table HE-30, Average Rental Rates 2022**, indicates that the median market rate rent for a two-bedroom unit is $1,615, a three-bedroom unit is $2,357, and larger units are $2,624 per month. Based on HNA **Table HE-26**, Ability to Pay for Housing Based on HCD Income Limits 2022, with the exception of a two-bedroom unit, a low-income household of four persons could not afford the asking rent. Therefore, while there is a large proportion of large units, lower-income households with five or more people may experience challenges in finding adequately sized units in their affordability range, which may result in overcrowded living conditions unless they are able to secure housing in one of the 56 assisted affordable complexes in the city or apply HCVs to market-rate, larger rental units.

Therefore, the City will provide incentives to developers, such as streamlined review or parking waivers, that construct affordable housing with larger units in areas of concentrated overcrowding to alleviate housing pressure on households that may be doubling up (Program 30).

OVERPAYMENT

HUD considers housing to be affordable for a household if the household spends less than 30.0 percent of its income on housing costs. A household is considered "cost burdened" if it spends more than 30.0 percent of its monthly income on housing costs, while those who spend more than 50.0 percent of their income on housing costs are considered "severely cost burdened."

In Stockton, 20.8 percent of households are cost burdened, and 21.0 percent are severely cost burdened, so a total of 41.8 percent of total households experience some level of overpayment. When evaluating overpayment among lower-income households in the city (43.9 percent of total households), this rate of housing cost burden for lower-income households is slightly higher in Stockton, at 75.0 percent, than in San Joaquin County (72.0 percent) and California (70.0 percent). When looking at overpayment by tenure, homeowners generally experience cost burden at a lesser rate than renters across all geographies. Approximately 27.9 percent of homeowners are cost burdened compared to 54.4 percent of renters. More specifically, approximately 25.6 percent of renters overpay for housing and 28.8 percent severely overpay; compared to 15.5 percent of homeowners overpay and 12.4 percent severely overpay. Some stakeholders described that many people in Stockton resort to uninhabitable housing

because they cannot afford anything better. They shared that landlords do not feel any pressure to fix units, knowing that their tenants are desperate for housing as housing costs continue to increase and housing supply is very limited. This data points to the need for more affordable housing units in Stockton to meet the needs of lower-income households.

In many circumstances, overpayment is closely tied to income, and lower-income households are most at risk of displacement due to overpayment, as presented in **Table HE-24, Housing Cost Burden by Household Income Classification**, in the HNA. According to the 2014-2018 CHAS, approximately 43.9 percent of households in Stockton are lower income, of which 75.0 percent overpay for housing—30.0 percent pay between 30.0 and 50.0 percent of their income for housing, and 45.0 percent pay over 50.0 percent for housing. Further, of the cost-burdened lower-income households, 72.5 percent are renters and 27.5 percent are owners. Approximately 58.6 percent of overpaying renters are severely cost burdened, and 64.4 percent of overpaying homeowners are severely cost burdened. In contrast, of Stockton residents making more than 80.0 percent of the AMI, 13.6 percent are overpaying and 2.2 percent are severely overpaying.

As shown in HNA **Table HE-24, Housing Cost Burden of Extremely Low-Income Households 2018**, 14.0 percent of the population falls into the extremely low-income category (ELI), of which 82.5 percent pay over 30.0 percent of their income for housing. Of the ELI households overpaying for housing, 88.7 percent pay over 50.0 percent of their income for housing, indicating a significant shortfall of resources affordable to these households. Approximately 21.4 percent of renters in Stockton are considered extremely low-income, compared to 5.9 percent of homeowners. The majority of ELI households are severely cost burdened—74.8 percent of ELI renters and 66.4 percent of ELI homeowners pay over 50.0 percent of their income for housing. This indicates that, while lower-income renters are more likely to experience cost burden, overpayment is particularly prevalent among all ELI households.

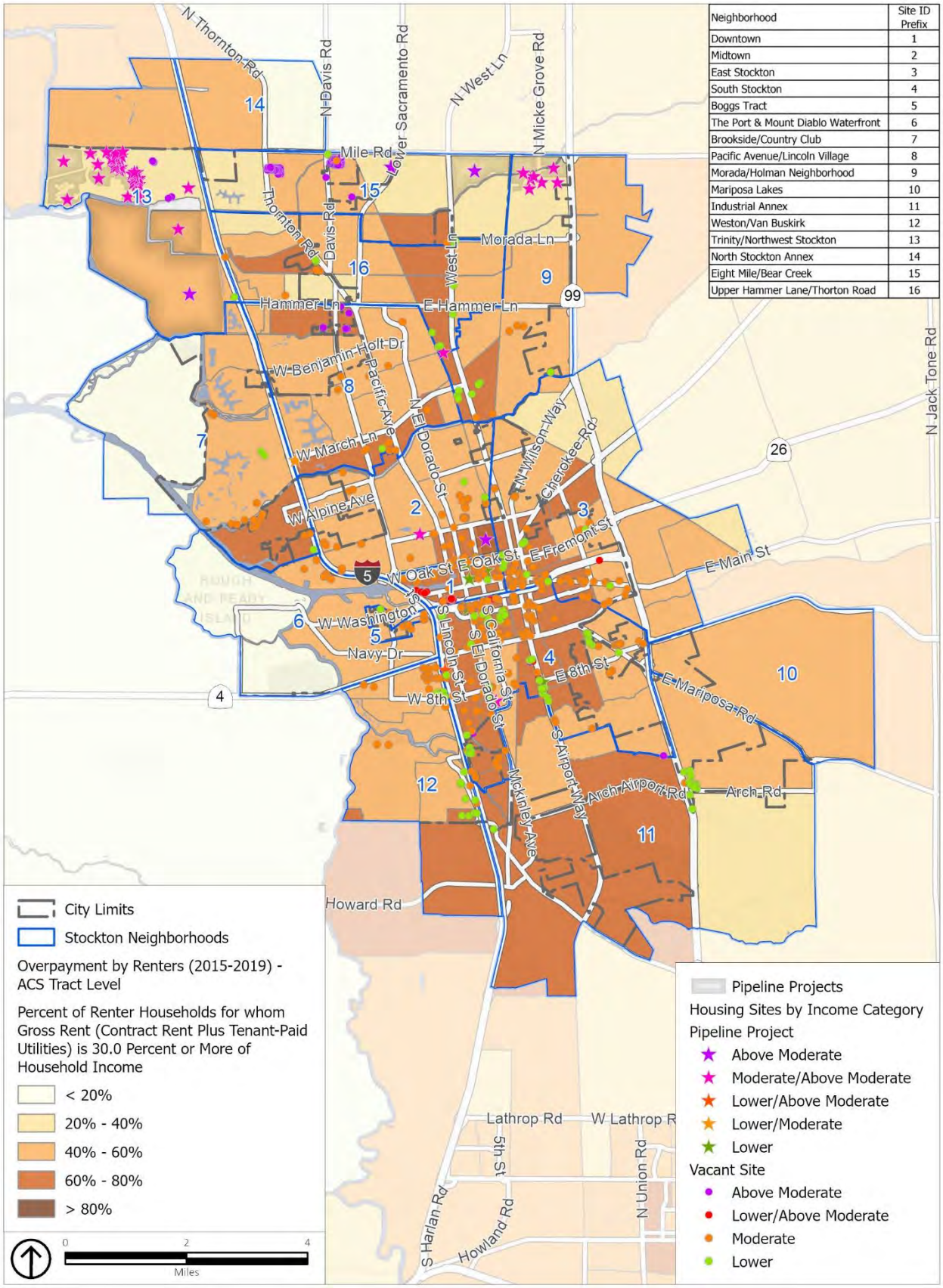
According to the 2016-2020 ACS, most of the city reflects renter cost burdened rates between 40.0 and 60.0 percent (**Figure HE-18, Renter Overpayment in Stockton**). The contiguous areas with a concentration of households experiencing rates above 60.0 percent are primarily found in the Midtown and East Stockton neighborhoods south of Harding Way, the Greater Downtown, and the South Stockton neighborhood, corresponding to the TCAC/HCD Areas of Segregation and Poverty and HUD R/ECAPs, and the two census tracts south of West Charter Way toward French Camp between I-5 and South El Dorado Street in the Industrial Annex neighborhood. North of the Calaveras River, in the Pacific Avenue/Lincoln Village neighborhood south of East March Lane, a lineal concentration of households experiencing rates of overpayment above 60.0 percent of renters is found from I-5 to the Union Pacific Railroad Sacramento Subdivision line. The majority of this concentration sees rates of renter households above 70.0 percent, lower-median incomes, six affordable housing complexes, and a predominantly Hispanic population, with one TCAC/HCD designation of Area of High Segregation and Poverty and identification as a HUD R/ECAP in the census tract surrounding Weberstown Park. However, likely due to proximity to Weberstown Mall, commercial uses and services along Pacific Avenue, and San Joaquin Delta College, TCAC/HCD resource opportunities in all other census tracts are designated Moderate and High.

The remaining sizeable concentration of renter households with high rates of overpayment is found along the western edge of the Morada/Holman neighborhood and Upper Hammer Lane/Thornton Road neighborhood between the Union Pacific Railroad Sacramento Subdivision line and West Lane. The area has a sizeable Hispanic presence with non-White populations above 81.0 percent, has an overall lower-income median income, contains eight affordable housing complexes, and renters represent an average of 70.0 percent of the households. The census tract south of Mosher Slough, north of East Hammer Lane, partially within the area known as Tam O'Shanter, including the 315 affordable units at Polo Run Family Apartments and 184 affordable Hampton Square Apartments, is 88.0 percent renter occupied and is designated by TCAC/HCD as an Area of High Segregation and a HUD R/ECAP. However, with the exception of this Area of High Segregation and Poverty, all of the census tracts in these neighborhoods have Moderate resource

opportunity designations. The northernmost census tract in the area south of Morada Lane in the upper Tam O'Shanter area, however, has socioeconomic characteristics that do not consistently align with the other census tracts with high proportions of overpaying renters. The median income in the upper block groups of the Morada/Holman neighborhood fall within the moderate-income range, and unlike the other census tracts with high rates of non-White populations, Asian residents are the predominant population at 37.5 percent of the households, followed by Hispanic residents at 33.0 percent, with Black and African American, and White non-Hispanic roughly around 12.5 percent each. Over 60.0 percent of the residents are homeowners, and with the exception of a few blocks of triplex units along West Lane, this area consists entirely of single-family detached units. Therefore, the renters in this tract are likely overpaying for single-family rental properties.

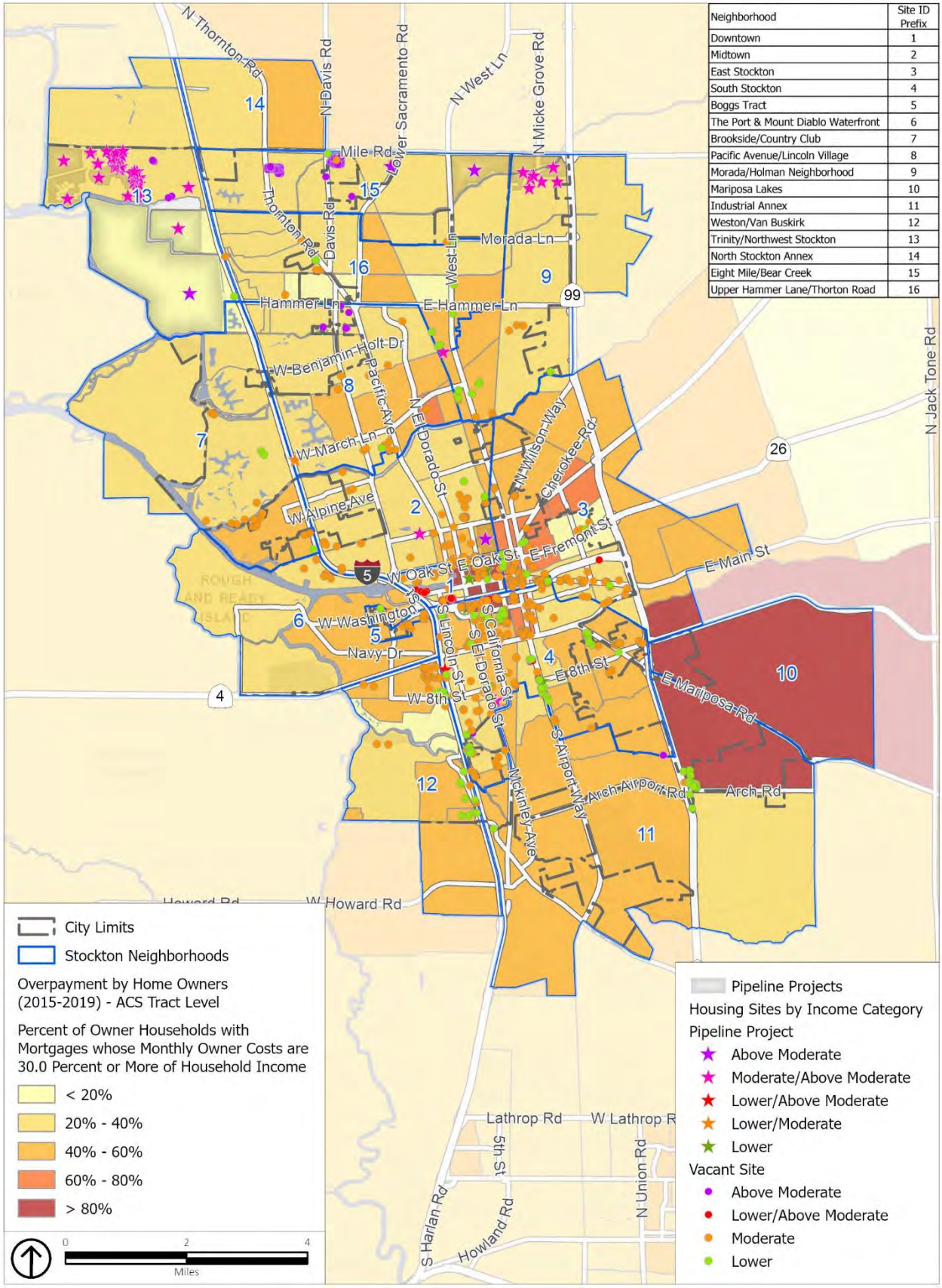
In contrast to renter overpayment, homeowners generally experience cost burden at a lesser rate. The highest rates of homeowner overpayment north of the Calaveras River generally align with high rates of renter overpayment, high rates of overcrowding, or both conditions. Homeowner overpayment rates between 40.0 to 60.0 percent are found south of Mosher Slough between the Union Pacific Railroad Sacramento Subdivision line and the Union Pacific Railroad Fresno Subdivision line and in a concentration of census tracts of residential stock generally built prior to 1980 on both sides of Pacific Avenue between West Swain Road and West March Lane/Calaveras River, inclusive of San Joaquin Delta College, Sherwood Mall, and a range of commercial and service uses. There is one census tract in this cluster designated as an Area of High Segregation and Poverty and a R/ECAP in which 74.3 percent of homeowners overpay for housing. However, 85.3 percent of the households within this census tract are renters, and therefore, 10.8 percent of total households in this census tract are homeowners who overpay for housing. Two additional census tracts within the Upper Hammer Lane/Thornton Road neighborhood between Lower Sacramento Road and the Union Pacific Railroad Sacramento Subdivision line north of Hammer Lane, known as the Ponce de Leon area, have rates of homeowner overpayment between 43.5 and 45.5 percent (Figure HE-19, Homeowner Overpayment in Stockton). Renter households comprise 64.5 and 53.7 percent of the residents in these census tracts, respectively, and although non-White population ranges between roughly 75.0 percent and 82.5 percent, this area is quite diverse, and although the predominant population in each block group in Hispanic, representation is below the city average, and proportions of Asian and Black populations are higher than the citywide average. The median income is just above the threshold between low and moderate income, although 24.0 percent of the population in the upper tract has incomes below the poverty line.

Figure HE-18: Renter Overpayment in Stockton



Source: 2015-2019 ACS

Figure HE-19: Homeowner Overpayment in Stockton



Source: 2015-2019 ACS

South of the Calaveras River, areas with higher concentrations of homeowners overpaying for housing (40.0 to 60.0 percent) generally include the El Pinal community in the East Stockton neighborhood and the Greater Downtown area encompassing the southern edge of the Midtown neighborhood, Downtown, and Homestead area of South Stockton north of SR-4, most of which correspond to a TCAC/HCD Area of High Segregation and Poverty and HUD R/ECAP. However, while it appears that a high proportion of homeowners in the lower Midtown and Downtown census tracts are overpaying, the proportion of homeowners in these tracts range from 2.0 to 11.0 percent of total households, and therefore the percentage of homeowners overpaying for housing is in actuality only between 0.4 percent and 17.4 percent of total households. Areas in the South Stockton neighborhood south of SR-4 and East Stockton neighborhood Fair Oaks area, including those TCAC/HCD designated as Areas of High Segregation and Poverty and HUD R/ECAPs, generally consist of renter households, with the highest incidence of homeowners overpaying for housing between 26.8 and 48.1 percent. The lower homeowner overpayment rate in the South Stockton and Industrial Annex neighborhoods may be partially attributed to housing type and condition, as the majority of units were constructed over 50 years ago, and historical property listings survey on Realtor.com, accessed December 2022, reveals that homes on the market 10 years ago in these neighborhoods were, on average, listed at 12.0 percent of current prices. The lower homeowner overpayment rate might be partially attributed to the presence of longtime residents in these neighborhoods who were able to purchase a home years ago at significantly lower prices than in the current market, (and generally current monthly housing costs would be based on this lower purchase price and tax valuation), and therefore would not be overpaying for their housing, assuming their income level has remained fairly stable. However, lower listing prices for these older units may provide an affordable opportunity for new residents desiring to purchase a home in these neighborhoods and would be within their ability to pay. As well, these neighborhoods are identified as experiencing varying levels of gentrification (see "Risk of Displacement" section), which suggests that higher-income households or real estate investors are purchasing these lower priced properties and rehabilitating them, which would also contribute to lower levels of overpayment.

Special-needs groups that may be disproportionately affected by high housing costs include large families, single-parent households, and seniors. As discussed in the "Overcrowding" section, large-family households often face special housing challenges due to a lack of adequately sized affordable housing. The higher costs required for homes with multiple bedrooms can result in larger families experiencing a disproportionate cost burden and increase the risk of housing insecurity. While overpayment rates for single-parent households are not available, the ACS reports that 28.9 percent of female-headed, single-parent households are below the poverty threshold. Therefore, these households may have an increased rate of overpayment. Seniors, comprising 21.6 percent of Stockton's households, often face increased displacement risk due to overpayment as this population more frequently relies on fixed incomes such as retirement savings or Social Security. According to the 2016-2020 ACS, 29.5 percent of senior homeowners overpay for housing, and 64.3 percent of senior renter households overpay, constituting 40.6 percent of all senior households in Stockton.

The sudden loss of employment, a health care emergency, or a family crisis can quickly result in a heavy cost burden, with limited affordable options available in the city, putting these populations that may already be at greater risk of displacement due to overpayment or overcrowding in a situation where they may lose their place of residence and experience homelessness, even when a source of income is still available. Residents finding themselves in one of these situations may have to choose between finding unsuitable lodging within their affordability range, becoming homeless, or moving out of the region. To reduce displacement risk as a result of overpayment, the City has identified the following programs: 7, 14, 15 and 17.

Regional Trends

In the San Joaquin COG region, nearly all of the unincorporated areas have rates of overcrowding below the statewide average of 8.2 percent of households. One exception is the census tract to the west of Stockton which has a rate of overcrowding of 16.2 percent of

households. This area is very sparsely populated with no Census Designated Places, so it is possible that limited housing availability near local agricultural employment encourages community members to share housing.

One additional census tract, which extends from southeast Stockton's SOI near the airport to the unincorporated area east of Manteca has a rate of overcrowding of 12.4 percent, but due to the size of the census tract it is difficult to determine whether or not overcrowded households are within Stockton's SOI.

Within incorporated areas, higher rates of overcrowding are located in north Tracy, east Lodi, central Manteca, and Lathrop. In the Lathrop area, census tracts on the city's outskirts have higher rates of overcrowding at 13.3 percent, while tracts in Lathrop's central areas range between 3.0 and 10.7 percent. In central Manteca, rates of overcrowding are lower, with the highest rate of overcrowding in the city only 9.3 percent. Rates of overcrowding in four census tracts in north Tracy range between 9.4 and 18.5 percent, while the rest of the city has rates below the statewide average. The east side of Lodi has the region's highest rates of overcrowding outside of Stockton, with as many as 31.4 percent of households experiencing overcrowding in this community. Rates of overcrowding in this area of Lodi are higher than many of the areas of Stockton with the highest rates of overcrowding.

Generally, overpayment among renters and homeowners tends to be medium to high across the San Joaquin COG region, with homeowners tending to have lower rates of overpayment in many parts of the county than renters. Overpayment among renters in this region is highest on the south side of Ripon, in central Manteca, in the unincorporated community of Lockeford, and in several census tracts in central and northern Lodi. In each of these areas, more than 60 percent of renter households pay more than 30 percent of their income on housing. In the majority of Lodi's census tracts at least 50 percent of renter households overpay for housing. Similarly, much of Manteca's census tracts have renter overpayment rates over 50 percent, with three tracts having renter overpayment rates over 60 percent. The west side of Ripon also has a high rate of renter overpayment at 63.9 percent, though the other two census tracts that cover the city have renter overpayment rates of 41.6 percent (central Ripon) and 21.8 percent (north Ripon and surrounding areas). Lockeford has one of the region's highest rates of renter overpayment, with 78.4 percent of renter households overpaying. This census tract has a low number of renter households (236 which is low compared to other census tracts) which may have an effect on this high percentage.

The east side of the unincorporated county area, including the communities of Waterloo, Peters, Linden, and Farmington, have rates of renter overpayment below 40 percent but above 20 percent, as do northern unincorporated communities of Acampo, Collierville, Clements, and Woodbridge.

The census tract that includes Thornton and the northwestern corner of the Stockton SOI, has a rate of renter overpayment of 41.4 percent. Because of the concentration of homes in Thornton, this is likely the central area of renter overpayment in this census tract. On the southwest side of the region, the Tracy area and surrounding unincorporated communities include a mix of tracts with rates of renter overpayment between 20 and 40 percent and between 40 and 60 percent. As much of these areas have the highest incomes in the region, it is important to note that renter overpayment effects even higher-earning, higher-resource areas in the county.

Few areas in the region have low rates of renter overpayment. In the unincorporated area west of Stockton, only 3.9 percent of renter households overpay for housing. However, this area only has 233 renter households, which is low compared to other census tracts. Similarly, two unincorporated census tracts directly north of Stockton and west of Lodi have only 147 and 141 renter households, and renter overpayment rates of 11.6 and 11.3 percent, respectively.

As is the case in the Stockton area, fewer areas of the region outside of the Stockton area experience extremely high rates of homeowner overpayment as compared to renter overpayment. One exception is a census tract in east Lodi. Of homeowner households with mortgages in this tract, 60.5 percent overpay for housing costs. As with several areas of particularly high renter overpayment, it is worth noting that only 195

homeowner households live in this census tract, which is low compared to other census tracts in the region. Three nearby tracts in east Lodi with higher numbers of owner households have rates of overpayment of 58.2, 53.2, and 48.5 percent.

On the north side of Lodi are two census tracts with owner overpayment below 20 percent, but the majority of the census tracts on the west side of Lodi have rates of overpayment between 30 and 40 percent. The unincorporated census tract to the north of Stockton and west of Lodi, which has a low rate of renter overpayment, has a medium rate of homeowner overpayment, 47.3 percent.

In contrast to its high rate of renter overpayment, Lockeford has a rate of owner overpayment of only 16.3 percent. This makes it unusual on the east side of the county, as the other census tracts which include unincorporated communities in this area have owner overpayment rates between 45 and 50 percent, including Peters, Linden, and Farmington. The Waterloo, Glenwood, and Noble Acres areas are also unusual, with only 13.6 percent of homeowners in this census tract overpaying for housing. Escalon is also in slight contrast to its surrounding unincorporated areas, with only 21.4 percent of homeowners overpaying for housing.

The majority of the north, west, and south sides of the unincorporated county and the remaining incorporated cities in these areas have medium rates of homeowner overpayment between 20 and 40 percent. Exceptions to this trend are a small number of census tracts in north Tracy, central Lathrop, and central Manteca. In each of these areas between 40 and 60 percent of homeowners overpay for housing.

HOUSING CONDITION

As discussed in the HNA, housing condition can be an indicator of quality of life. Substandard conditions present a barrier to fair housing as occupants are susceptible to health and safety risks associated with poor housing conditions and at risk of displacement if conditions make the unit unhabitable or if property owners must vacate the property to conduct repairs. As housing units age, they deteriorate without ongoing maintenance, which can present a fair housing issue for occupants, reduce property values, and discourage private reinvestment in neighborhoods dominated by substandard conditions. Typically, housing over 30 years is more likely to need repairs or rehabilitation than newer units. As shown in the HNA, **Table HE-22, Age of Housing Stock and Housing Stock Conditions by Tenure**, approximately 66.8 percent of housing units in Stockton are older than 30 years and may need repairs,. This is lower than for the state as a whole, where 69.2 percent of units are older than 30 years, yet higher than 61.5 percent of housing units in San Joaquin County. This need has informed the inclusion of several programs in the Housing Element, including rehabilitation assistance and relocation assistance.

In Stockton, 33.2 percent of housing units were built after 1990. Of the multifamily complexes with five or more units in Stockton, 10.0 percent were built since 2000, 28.4 percent were built between 1980 and 1999, 38.3 percent were constructed between 1960 and 1979, and 23.3 percent were constructed prior to 1960. Smaller multifamily unit types, including duplex, triplex, and fourplex units, constitute 50.6 percent of the multifamily units in the city. Only 5.7 percent of this type of unit has been constructed since 2000, and 25.5 percent were added to the housing stock between 1980 and 1999. The majority of small multiplex units were constructed between 1960 and 1979 (36.9 percent), and 33.5 percent of this type of housing stock were built prior to 1960. Additionally, 61.0 percent of mobile homes in Stockton were built prior to 1980, making them over 40 years old, an age that generally indicates a need for replacement or rehabilitation. Mobile homes typically deteriorate more rapidly than stick-built homes and so are more likely to need significant repairs as they age to maintain conditions. Further, these homes are often more affordable to lower-income households, and the cost of regular repairs can present a barrier to maintaining good housing condition. Therefore, the City will improve communication of rehabilitation assistance programs currently available for lower-income households, including eligible owners of mobile homes and rental property owners to alleviate substandard conditions before reaching a point of inhabitability (Program 22).

The Neighborhood Services Division of the Police Department enforces codes, laws, and regulations for the abatement of substandard housing conditions and blight issues. Code enforcement statistics from the Neighborhood Services Division provide a sense of the number of units that may need renovation, rehabilitation, or replacement in the city. As shown in the HNA, Table HE-23, Code Enforcement Cases, the Neighborhood Services Division processed 234,924 housing code enforcement cases over the past 16 years, at an average of about 14,683 cases each year. The most common housing violations are structural problems, raw sewage, exposed wiring, and other exterior housing problems.

According to the 2016-2020 ACS data, approximately 46.1 percent of households experience one or more of the following conditions: lacks complete kitchen, lacks complete plumbing, is overcrowded, or is cost burdened. While these estimates include households that are overcrowded or cost burdened but do have a complete kitchen and plumbing, it can be assumed that at least a portion are living in units without these basic facilities, which are indicators of substandard housing conditions. ACS data estimate that 0.1 percent of homeowner households live in a unit without complete kitchen facilities, and 0.1 percent without complete plumbing. Approximately 1.1 percent of renters live in units lacking complete kitchens, and 0.3 percent without complete plumbing facilities. Due to the relatively low incidence of kitchen or plumbing problems, most of the households experiencing substandard conditions are attributed to either severe overcrowding, severe overpayment, or both. However, to help property owners make necessary repairs, particularly lower-income property owners and managers of deed-restricted housing, the City has included Program 22 to continue to promote the availability of rehabilitation assistance programs.

While the City has not had the resources to conduct a housing conditions survey in recent years, past surveys focused on three specific areas that were formerly Redevelopment Agency project areas: Midtown, South Stockton, and North Stockton. These are the areas of the city with the greatest concentrations of blighted structures and residences in need of significant rehabilitation. Based on these past surveys and a consideration of current conditions, it is estimated that there are around 4,000 housing units needing major repairs or replacement. In addition, the City is currently working on an updated survey of these areas and its results will inform future rehabilitation efforts (see Program 22).

DISPLACEMENT RISK

A combination of factors can result in increased displacement risk, particularly for lower-income households. Displacement risk increases when a household is paying more for housing than their income can support, their housing condition is unstable or unsafe, or when the household is overcrowded. As discussed under "Integration and Segregation" and "Overpayment," there are disproportionate patterns of concentrated poverty in the city that may correlate with increased displacement risk. Other factors, besides those listed above, are vacancy rates, availability of a variety of housing options, and increasing housing prices compared to wage increases. The Urban Displacement Project, a joint research and action initiative of UC Berkeley and the University of Toronto, analyzes income patterns and housing availability to determine the gentrification displacement risk at the census tract level. For the San Joaquin County Displacement Risk Assessment (2019), the research team used the Urban Displacement Project's Bay Area model to assess census tracts in San Joaquin County for displacement risk. Using the Urban Displacement Project model as a foundation, the research team made select modifications based on best practices and stakeholder feedback. This included modifying the definition of the "region" from 13 counties to San Joaquin County alone, adjusting income parameters, and collapsing the original nine typologies into four displacement typologies specifically relevant to San Joaquin County, as follows:

- Susceptible to and Ongoing Displacement: These tracts are low or mixed low income, and some had an absolute loss of low-income households during the period of 2000 to 2018.
- Varying Levels of Displacement: These tracts have varying levels of income and housing affordability, and some tracts gentrified during 1990-2000 or 2000-2018, but all tracts experienced an increase

in housing costs and/or rental value during 2012 to 2018.

- **Moderate and Mixed Income:** These tracts range from moderate to high income, and other variables are relatively stable.
- **Varying Levels of Exclusiveness:** These tracts range from moderate to high income, and housing costs are increasing. In some tracts, low-income households are excluded from entering and decreasing in numbers.

According to the San Joaquin Displacement Study (2021) by the San Joaquin Council of Governments, Enterprise Community Partners, and UC Davis Center for Regional Change, 51.0 percent of the population in San Joaquin County falls in the Varying Levels of Exclusiveness typology. In Stockton, it is most prevalent in the northern and southern neighborhoods, including most residential areas in Trinity/Northwest Stockton, North Stockton Annex, Eight Mile/Bear Creek, upper Morada/Holman, Brookside/Country Club, lower Weston/Van Buskirk, and western residential areas along the I-5 in Midtown and Pacific Avenue/Thornton Road neighborhoods. Interview feedback during the San Joaquin Displacement Study process indicated that these communities have seen large amounts of growth in the 2000 to 2018 time period, particularly related to in-migration of households employed in Silicon Valley and in higher-earning jobs throughout the Bay Area that can now work remotely or commute.

Almost 30.0 percent of San Joaquin County households fall into tracts designated Moderate and Mixed Income. This tract typology is relatively stable, without much change in terms of household income over the data period. This typology shows up most frequently in less urbanized and less populated areas of the county that have not experienced the same type of growth occurring around the periphery of the city found in more urbanized communities such as Stockton. However, there are a few portions of Stockton that are categorized as Moderate and Mixed Income in the upper areas of Brookside/Country Club neighborhood, Upper Hammer Lane/Thornton Road neighborhood, and east of Lincoln Village in the southwestern portion of the Morada/Holman neighborhood.

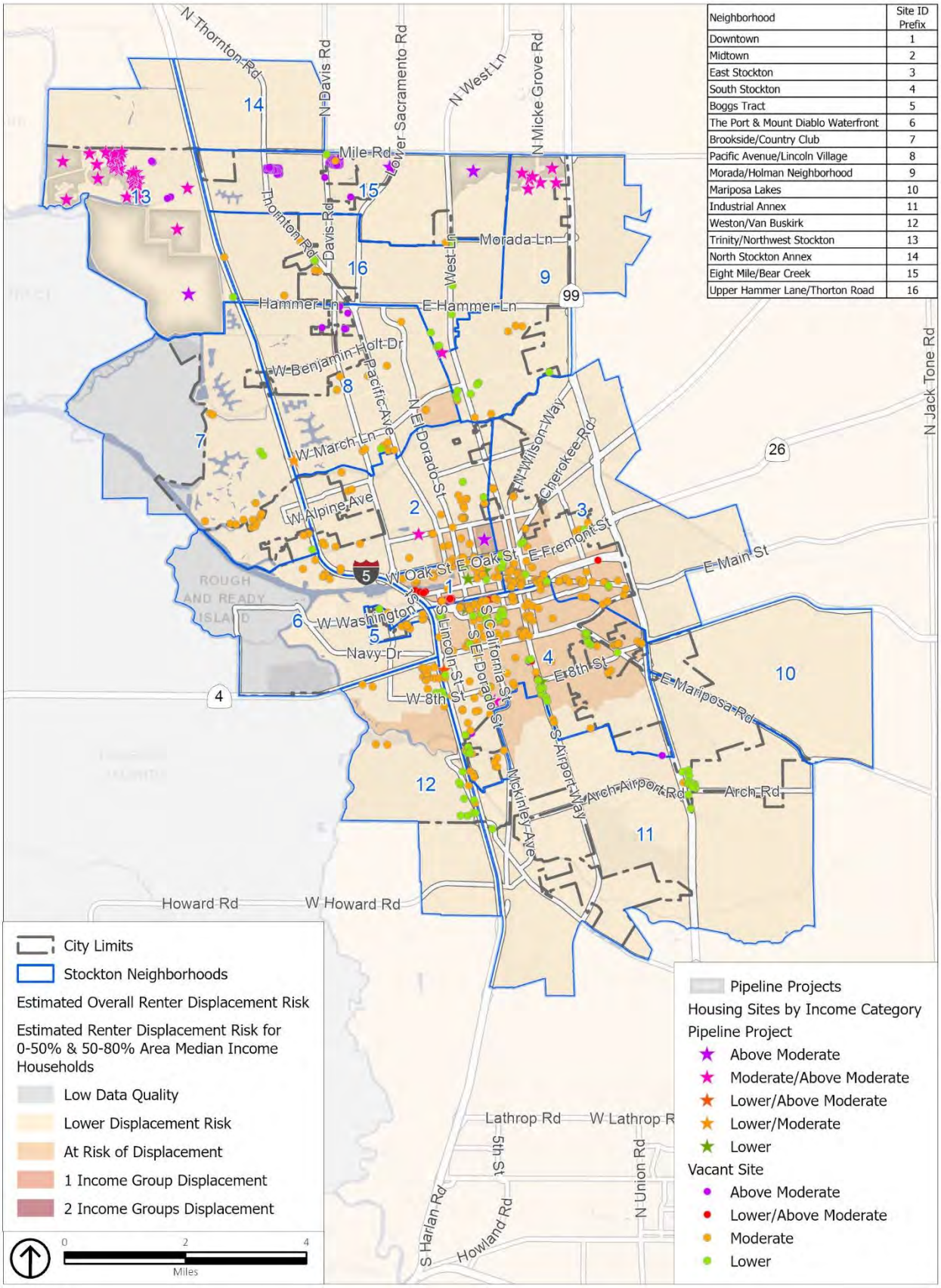
Neighborhoods designated Susceptible To and Ongoing Displacement, and experiencing Varying Levels of Gentrification are those facing the highest risk of and potential impact from displacement. These tracts generally align with high proportions of lower-income households and concentrations of very low-income households, where the majority of households consist of populations of color, there are a high share of renter households, and high rates of renter overpayment correlating to increases in rent above the county median. The methodology also identifies areas where data indicating an absolute loss of low-income households between 2000 and 2018 correlate with relocation of households in response to increases in housing sale prices and rent costs. In Stockton, the mapping tool designates the majority of areas experiencing gentrification and those that are susceptible to displacement within the central, downtown, and south Stockton neighborhoods, including portions of Upper Hammer/Thornton Road in the vicinity of Hammer Lane/Lower Sacramento Road and the Union Pacific Fresno Subdivision Railroad; residential areas around Lincoln Village, Sherwood Mall, Stonecreek Village, Weberstown Mall, and San Joaquin Delta College in the Pacific Avenue/Lincoln Village neighborhood; southwestern residential areas in the Morada/Holman neighborhood; eastern and southern portions of the Midtown neighborhood; the central section of the Port and Mount Diablo Waterfront neighborhood; Downtown; and South Stockton. These two typologies apply to approximately 18.0 percent of households countywide, but they appear to constitute a significant portion of the city, generally corresponding to lower-income areas in Stockton with high rates of renters, renter overpayment, and non-White populations. The recent influx of relocating households from the Bay Area may be a contributing factor to rising home values and displacement of existing lower-income households in these neighborhoods, where homes and rents may be increasing beyond the ability to pay for current lower-income residents, yet might be attractive to in-migrating populations, thus increasing potential for gentrification.

According to the AFFH Mapping Tool (ACS 2015-2019), the California Urban Displacement Project: Estimated Displacement Risk Model Overall Displacement Risk data (see **Figure HE-20, Elevated**

Displacement Risk) identify the majority of the Greater Downtown, South Stockton, and East Stockton neighborhoods, all of which correlate with locations of affordable housing complexes, and the portion of the Weston/Van Buskirk neighborhood including the Sierra Vista public housing as At Risk of Displacement. As well, a block group in the Pacific Avenue/Lincoln is identified as at risk of displacement. This assessment generally corresponds to the findings of the San Joaquin Displacement Study, although at less detail some transitioning areas are overlooked.

Increases in home and rental prices have impacted residents throughout Stockton, though renters are typically more burdened by housing market increases in annual rent increases, compared to homeowners who have fixed-rate mortgages. As identified in the HNA, according to Redfin, as of November 2022, the median sales price in Stockton was $420,000 for all home types. Supplementing the 2016-2020 ACS data discussed in the HNA, the Stockton Housing Action Plan Market Conditions Report, 2022, analyzed the home sale price distribution for single-family and condominium units in Stockton between November 2021 to April 2022. According to this survey, 1,705 single-family units sold in Stockton during the time period, the majority of which were three or more bedroom units. The median home price for a single-family home was reported at $425,000, comparable to the above Redfin estimate, while the bulk of units ranged from $300,000 to $600,000. During this same time period, 88 condominium units sold (4.9 percent of total units sold during this period), the bulk of which were two-bedroom units, with an overall median sale price of $195,000.

Figure HE-20: Elevated Displacement Risk



Source: Urban Displacement Project, 2022 (HCD AFFH Data Viewer).

As discussed in the Stockton Housing Action Plan Market Conditions Report, 2022, based on historical Redfin market median home sale price trends for Stockton and San Joaquin County from February 2012 through April 2022, both the city and the county experienced a dramatic price increase over that period. The county's median home sale price grew by 264.0 percent, and the city's grew by 286.0 percent. However, the median for the city continues to lag below the countywide median, suggesting that Stockton may have a larger inventory of older, less costly homes. However, while the median home value in Stockton was lower than the county and state, the median home price in Stockton is still only affordable to above moderate-income households. In the HNA, Table HE-26, Ability to Pay for Housing Based on HCD Income Limits, 2022, shows that the maximum affordable price for a moderate-income family of four is $416,651, and for lower-income households is $270,415. (HCD income limits are the basis for determining eligibility for affordable housing.) Purchasing a home above these limits could result in overpayment and/or overcrowding and potential risk of displacement. These maximum ability-to-pay thresholds for a three- or four-person household are significantly lower than the median home sale price for a three-bedroom single-family home. Though 2016-2020 ACS income data indicate that approximately 25.7 percent of Stockton households earn $100,000 per year or more—which is generally considered the threshold between a moderate income and an above moderate income for a household of four, according to HCD—and would be able to afford the median priced three-bedroom home in 2022, moderate-income households would generally be limited to two-bedroom units and three-bedroom homes at the lower end of the available market listings. These prices outpace income growth, tending to put housing costs beyond the means of more households over time.

Single-family attached homes, including smaller-sized properties such condominiums, duplexes, triplexes, and quadplexes, at times function as naturally occurring affordable housing (NOAH) units for low- to moderate-income households. These market-rate units are generally older properties that may not be well maintained and command lower rents or listing prices due to the property's age and more limited upkeep. The preservation of NOAH units in multifamily properties accommodates workforce and middle-class households that may not meet housing subsidy requirements but earn an insufficient income to avoid overpaying for housing. For a low-income household, the maximum affordable home price ranges from $216,495 for a two-person household to $292,064 for a five-person household (Table HE-26 in HNA). Low-income households could afford a one- or two-bedroom and a limited number of three-bedroom condominium units. However, the sales listings in the Stockton Housing Action Plan Market Conditions Report, 2022, referencing the market listing resource List Source, indicated a constrained supply and limited availability of these affordable units.

In order to increase and promote sustainable homeownership for the full range of household incomes and needs, Stockton should focus on infill housing development to encourage development of underutilized properties and maximize the production of units in order to serve the growing number of residents and their households. Given the large number of households earning the median household income or less and facing a housing cost burden, the production of condominiums, townhomes, and other smaller ownership units, especially in more urbanized areas in infill development projects with a mix of market-rate and affordable units, could alleviate supply constraints in the housing market. More importantly, infill housing projects producing single-family attached homes are relatively affordable to low-income households in the city and would expand the opportunity for homeownership to a broader range of households.

Rent prices in Stockton have also increased significantly and present a barrier to lower-income households. Current rental market conditions based on information from CoStar Group, 2022, identified that over 85.0 percent of available rentals in early 2022 were one- and two-bedroom units. Overall, the vacancy rate of market-rate rental units for CoStar Group's inventory is 3.4 percent, which, compared to a healthy rental vacancy rate of 5.0 percent, indicates a shortage of available units. This limited availability of rental stock increases competition for units, and those that face challenges in meeting the credit check or deposit requirements could face homelessness. According to the survey, between March and June 2022, the average

asking rent for multifamily market-rate units increased by over 9.0 percent, with the largest rent increase in one- and two-bedroom units. As discussed previously in the HNA (Table HE-30 Average Rental Rates, 2022), based on the HCD income limits, the average market rate three-bedroom apartment with an average monthly rent of $2,357 is affordable only to a moderate-income household of four or five persons (120 percent of the AMI), which is an annual household income of approximately $102,000. The average monthly rental cost for a two-bedroom unit is $1,615, which falls within the ability-to-pay range for a low-income household of four, requiring an average income up to $66,200 (Housing Action Plan for the City of Stockton, 2022, indicated a required income of between $50,000 to $60,000, although rental data was accessed at an earlier date than the HNA date of October 2022 for Zillow inventory). Although there is limited rental stock available at lower price points, it may not be suitable to meet the size, location, mobility, access to resources, or other requirements of the household without overcrowding or overpayment. Very low-income households and households in poverty in general will experience significant challenges in securing rental housing without assistance in the current market in Stockton.

More than 58.0 percent of all renter households earn less than $50,000, and the median renter household income is approximately $41,000, indicating a significant existing need for below-market-rate rental housing. This suggests that roughly half of Stockton households would struggle to afford average-priced rental housing in the city. The data demonstrate that while there may be units affordable to lower income households, there is a shortfall of housing affordable to extremely low-income and very low-income households. Therefore, programs aimed at assisting households to secure below-market-rate rental housing or more affordable ownership housing options could assist existing Stockton residents as well as any new residents at lower income levels.

Though housing costs have increased rapidly, wages have not kept pace, as discussed in the HNA. In addition, recent increases in incomes could be partially attributed to the influx of households from the Bay Area with higher paying jobs. The difference in these trends (housing cost vs. wages) indicates growing unaffordability of housing in Stockton. The discrepancies between wage increases and rising housing costs that are resulting in increased displacement risk are supported by the findings of the San Joaquin County Housing Displacement Report. The report found that a shortage of housing production, rising housing costs, and the influx of residents from the Silicon Valley and Bay Area have intensified housing demand and gentrification of older neighborhoods, resulting in increased displacement risk, particularly for lower-income households.

To address affordability challenges, the City will encourage and incentivize development of affordable housing units, particularly in higher opportunity areas, and will develop a program to connect lower-income residents with affordable housing opportunities and identify funding for financial assistance for first time homebuyers (Program 12).

Regional Trends

Only one area in the region outside of Stockton is considered to be a community at risk of displacement, the east side of Lodi. This neighborhood was determined to be At Risk of Displacement. The remaining COG region was designated an area at Low Risk of Displacement. The census tract immediately west of Stockton was not evaluated as part of the Urban Displacement Project's study.

HOMELESSNESS

As discussed in Section 2, Existing Needs Assessment, the 2022 countywide point-in-time homeless count identified a total of 2,319 homeless persons in San Joaquin County, of which 893 unsheltered persons were counted in Stockton. Of the total 2,319 individuals, 41.6 percent were sheltered, while 58.4 percent were unsheltered. Because encampment locations in the city are not fixed, reported encampment areas may change at any time due to the changing needs of encampment residents or changes to a sense of security. Encampments tend to be located in parks or other open spaces near the city's waterways, near highway overpasses, or in commercial and light industrial corridors.

A large number of unsheltered homeless community members have created a string of encampments along the Mormon Slough, just south of downtown. Depending on the point along the slough where encampments are located, some areas have close access to transit and commercial areas. Bus routes on the Weber Avenue corridor, including the 47, 515, and 715, are in close proximity to Mormon Slough, as are routes on South Lincoln Street (515 and 715).

Other encampments south of downtown have been located at South Airport Way and East Clay Street. This area is near a grocery store and the Salvation Army with its associated services, plus the transit routes that run on South Wilson Way (378, 580). Slightly further away, residents encamped in this area can also reach the Route 49 bus at South B Street. There have also been several long-standing encampments along West Church and South Harrison near the St. Mary's Community Services and Dining Room, and in a number of parks in the city. Transit and resource access in the area of St. Mary's is similar to that of Mormon Slough, with close proximity to Lincoln Street's transit lines.

The St. Mary's Community Services campus offers comprehensive services for persons experiencing unsheltered homelessness in Stockton. The Dining Room serves three meals a day, year-round and oftentimes provides an entryway to additional on-site programs and services that can lead to stability and wellness. Their shower and clothing center is open six days a week, with a non-profit partner Loads of Hope bringing their free mobile laundromat on additional days. On-site and free health services include a dental clinic, medical clinic operated by Community Medical Centers, dedicated recuperative care beds, and a Health Ambassador program in partnership with St. Joseph's Medical Center that offers warm hand-offs to and from the hospital and other treatment programs. Case managers and the Housing Navigation Teams work with individuals and families to create individualized case plans and pathways to stable housing. Finally, St. Mary's campus operates three low-barrier shelters for men, women, and families.

Parks with encampments include McKinley Park, south of downtown; Banner Island Ballpark, located in the downtown area; and Louis Park, near the Country Club unincorporated community. McKinley Park is in a more residential area, but has access to schools and to transit along East 8th Street and South El Dorado Street (Routes 510 and 710). Banner Island Ballpark is close to commercial resources and is served by the transit routes of West Fremont Street (04, 545, and 725) and is a close walk to transit routes on Center Street (04, 90, 91, 93, 545). Louis Park is in a more residential area but is also served by Route 04. Other encampments on the west side of the city are located around overpasses of I-5 and along Ten Mile Slough near the unincorporated Country Club neighborhood. Ten Mile Slough is located in a predominantly residential and recreational area and is not served by transit.

On the city's northeast side, encampments have been located at the intersection of March Lane and Fred Russo Drive, and on the northwest side along White Slough. The neighborhood around March Lane and Fred Russo Drive is primarily residential, but March Lane is served by routes 335, 340, and 371 at this intersection. Depending on the location of the encampment, homeless residents camped along White Slough may be able to access commercial centers and transit, including a stop in the commercial center on Mariners Drive.

Stockton Police and Fire Departments partner with a number of public and private organizations on a multi-agency Homeless Outreach Team to ensure that homeless encampments are safe, to provide health care and behavioral health services, and to encourage individuals to move to shelters or housing. Partners include Couty Behavioral Health Services, Whole Person Care teams, Community Medical Centers (via Care Link "Health Care for the Homeless"), San Joaquin County District Attorney's Office, and County Public Health Services.

The San Joaquin Continuum of Care, San Joaquin County, the City of Stockton as well as the other cities in the County adopted a Regional Plan to Address Homelessness. In line with HHAP 1-5 requirements, most recently HHAP 5, the City has adopted a Homeless Action plan that tracks to state mandated performance measures. St. Mary's Community Services is the largest recipient of State allocated Homeless Encampment Resolution Funds and is accountable to those funds.

Those funds will expand a partnership with St. Mary's Community Services and STAND Affordable Housing for an additional 17 multi-room homes and will focus efforts on moving individuals from CalTrans District 10's highest priority encampment: SJ 4 EB/WB at SB/NB SJ 5 Interchange Complex (PM 16.21), part of the Mormon Slough encampment, into housing. In addition, 2024 will see the completion of nearly 300 low-barrier modular units for people who are unsheltered, a navigation center with up to 180 beds, and three Homekey Projects creating more than 108 units of homeless housing. Given current numbers, the City will nearly close the gap on unsheltered homeless.

The San Joaquin Continuum of Care recently completed the 2024 PIT unsheltered Count utilizing ESRI's ArcGIS tool. Once analyses are complete, the City will receive geotagged data that will provide actionable insight into where to allocate resources, provide services, or administer outreach. The City's Police Department and CalTrans intends to share any future encampment mapping efforts with City staff.

The City has included several programs in the Housing Element that will help to address the current and future needs of homeless community members. As part of Program 25, the City will continue to support organizations that assist persons experiencing homelessness, including applying for funding and pursuing private donations to support these organizations. Through Program 6, the City will encourage the development of Accessory Dwelling Units, which have the potential to serve lower-income households that may currently be experiencing homelessness. Through Program 11, the City will coordinate with the Housing Authority to continue to offer the Housing Choice Voucher and will implement a Housing Choice Voucher education program with the goal of increasing the number of landlords that accept these vouchers that can serve lower-income households that may be experiencing homelessness. The City will work to increase the overall number of affordable housing units that are available in the city through Programs 19 and 20.

Regional Trends

With 2,319 individuals counted as part of its 2022 PIT count, San Joaquin County has a similar number of homeless residents to neighboring Contra Costa County, which counted 2,277 homeless residents in the same year, and slightly higher than that of Stanislaus County, which had a total homeless population of 1,857 that year. Solano County also had a lower count of homeless residents that year (1,179 total). Tuolumne County, which is more rural in character, counted 266 homeless residents in 2022. Sacramento County had a significantly higher number of homeless residents in 2022 compared to San Joaquin County, with 9,278 residents experiencing homelessness, either sheltered or unsheltered.

Large cities like Stockton tend to be the central point for homeless residents to congregate, as it allows them to be closer to jobs and essential services. Approximately 66 percent of Stockton's unsheltered homeless community was in Stockton on the night of the 2022 PIT count. Similarly, in Sacramento County, 67 percent of unsheltered residents were in the City of Sacramento during the 2022 PIT count. In Stanislaus County, 77 percent of all homeless residents were in Modesto, though this number was not divided into sheltered and unsheltered populations.

OTHER RELEVANT FACTORS

HISTORY OF DEVELOPMENT TRENDS

The city was established by Captain Charles Weber in 1848 with the purchase of 49,000 acres of land through a Spanish land grant and the intention to supply the Gold Rush. The City was officially incorporated soon after in 1850. Following its role as a major supply point during the Gold Rush, shipbuilding served as the primary industry in the city, and agriculture began to take a stronghold in the valley. The city's strategic location takes advantage of the navigable waterways of the San Joaquin Delta, the rich soils, availability of water, and numerous railroad lines converging in the city and connecting it to the major distribution centers in the San Francisco Bay 90 miles to the north. The Port of Stockton officially opened as the first inland seaport,

which contributed to the city's growth and identity. Following WWII, the city's economy shifted away from shipbuilding to agricultural operations, industrial operations, and product manufacturing, but it remains a major shipping point for these commodities.

The city originally developed around the waterway in the Port and Mount Diablo Waterfront neighborhood and Downtown area, which later would become the Port of Stockton. Development expanded to the north after the turn of the century into the lower portion of the current Midtown neighborhood where University of the Pacific, San Joaquin Delta College, California University-Stanislaus, and Dameron Hospital were established, and to the south in the South Stockton neighborhood in an area known as the Homestead. Both of these areas are a current resource of older residential housing stock. By the late 1960s, the city encompassed the Downtown neighborhood, which remained the central business district with Main Street as the anchor; the Midtown neighborhood in its entirely; and residential and supporting commercial uses north of the Calaveras River closely following Pacific Avenue, North El Dorado Street, and West Lane in the Pacific Avenue/Lincoln Village neighborhood, extending just north of West Hammer Lane in the Upper Hammer Lane/Thornton Road neighborhood. Though a portion of the residential areas in the Midtown neighborhood are smaller, older, single-family and small multifamily units, the portion of Midtown south of West Harding Way is also home to the Magnolia Historic Preservation District. Development had also extended into both the East Stockton neighborhood (previously called Fair Oaks) and the South Stockton neighborhood (inclusive of unincorporated county islands). Only a small section the southwest corner of the Brookside/Country Club neighborhood west of I-5 had been developed, most of which is unincorporated county island.

According to the 2016-2020 ACS, the number of owner-occupied and renter-occupied units is almost equivalent. The greatest period of residential growth in Stockton occurred between 1970 and 1979, during which 18.9 percent of the city's current occupied housing stock was constructed, with a predominance of multifamily unit types (21.7 percent of current renter-occupied units and 16.0 percent of the current owner-occupied units). Much of this multifamily development occurred west of the I-5 in the Lincoln West Planned Community in the northern portion of the Brookside/Country Club neighborhood as duplex and condominium complex housing typology. Vacant tracts in the central portions of the city between West Hammer and Morada Lanes in the Upper Hammer Lane/Thornton Road and Morada/Holman neighborhoods were filled in with primarily single-family and duplex housing, becoming the destination for the Asian population to relocate following the disruption to the Asian community in the 1960s from the right-of-way for the cross-town SR-4. These neighborhoods in the northeast section of the city currently have a concentration of predominantly Asian residents.

A second significant period of growth occurred in the following two decades, between 1980 and 1999, resulting in an additional 28.1 percent of the city's housing stock, although during this time period a slightly greater proportion of owner-occupied units were constructed (29.0 percent) compared to renter-occupied units (27.3 percent). Growth on the west side of I-5 occurred during this time frame, and this major transportation route functioned as a physical barrier that allowed developers to promote residential neighborhoods branded as distinctly different in character from the rest of the city. The majority of the Brookside/Country Club neighborhood was developed as a master planned golf course community, with satellite planned-development gated communities and upscale market rate single-family units and supporting commercial space. There was a spurt of development between 2000 and 2009 in the Eight Mile/Bear Creek and Trinity/Northwest Stockton neighborhoods, the Morada/Holman neighborhood north of Morada Lane, and the Weston Ranch community in the Weston/Van Buskirk neighborhood, during which 17.4 percent of the housing stock was built, primarily owner-occupied housing (24.2 percent of owner-occupied housing stock, and 10.6 percent renter occupied-housing). Only 1.9 percent of the housing stock has been built since 2000, indicating a decline in residential growth in Stockton over the past two decades. However, there currently are a number of market rate subdivisions under construction in the northern end of Morada/Holman and northwestern corner of Trinity/Northwest (Westlake subdivision), and Eight Mile/Bear Creek neighborhood east of North Lower Sacramento Road that might not

have been taken into account during the 2016-2020 ACS data period.

Like several other cities in the San Joaquin Valley, immigration and historical exclusionary practices have contributed to the various development patterns found in the city today. The Chinese were the first major group of non-European settlers in Stockton, living along Miner Street near the waterfront and later moving to East Washington Street, which became Stockton's Chinatown. The next wave of agricultural worker immigrants from Japan, the Philippines, and the Punjab province of India also faced housing discrimination and were restricted from living north of Weber Street, which was Stockton's "color line," according to the Japantown Atlas Overview Map: Stockton Japanese American Businesses of 1940 (1917 and 1951 maps). However, unlike the earlier Chinese, the Japanese and Filipino immigrants were predominantly family units and formed more cohesive cultural communities, expanding upon the earlier Chinatown settlement and establishing a presence from the East Weber levee south to Lafayette Street, between South Commerce and South Hunter Street.

These areas were impacted economically during the Japanese internment period, as businesses closed and homes were abandoned. With the absence of the Japanese workforce, the federal Bracero program brought in temporary Mexican workers, many of whom inhabited the vacated housing available in the evacuated China and Japan Town communities. While there were few African Americans in Stockton prior to WWII, after the war many servicemen remained in the Stockton area and filled available shipyard and growing manufacturing jobs. As the invisible Weber Avenue "color line" remained unspoken yet in effect, this new immigrant population generally established themselves in the older residential areas in South Stockton as well as in the vicinity of the Filipino, China, and Japan Town communities, close to the port and industrial areas where the jobs were. Upon return from the internment camps, the Asian community was reinstated, but many residences and businesses had been re-occupied by Bracero and African-American workers, and the concentration of non-White population expanded southward.

When the color line was lifted concurrently with the construction of cross-town connector SR-4 in 1961, much of the Asian population relocated north of the Calaveras River, with significant concentrations settling in what is currently the Morada/Holman neighborhood and Upper Hammer Lane/Thornton Road neighborhood east of West Lane. The other communities of color, including the displaced Filipino residents, remained in the vicinity of the Downtown or relocated south of the cross-town freeway in South Stockton or into East Stockton in the former Fair Oaks area.

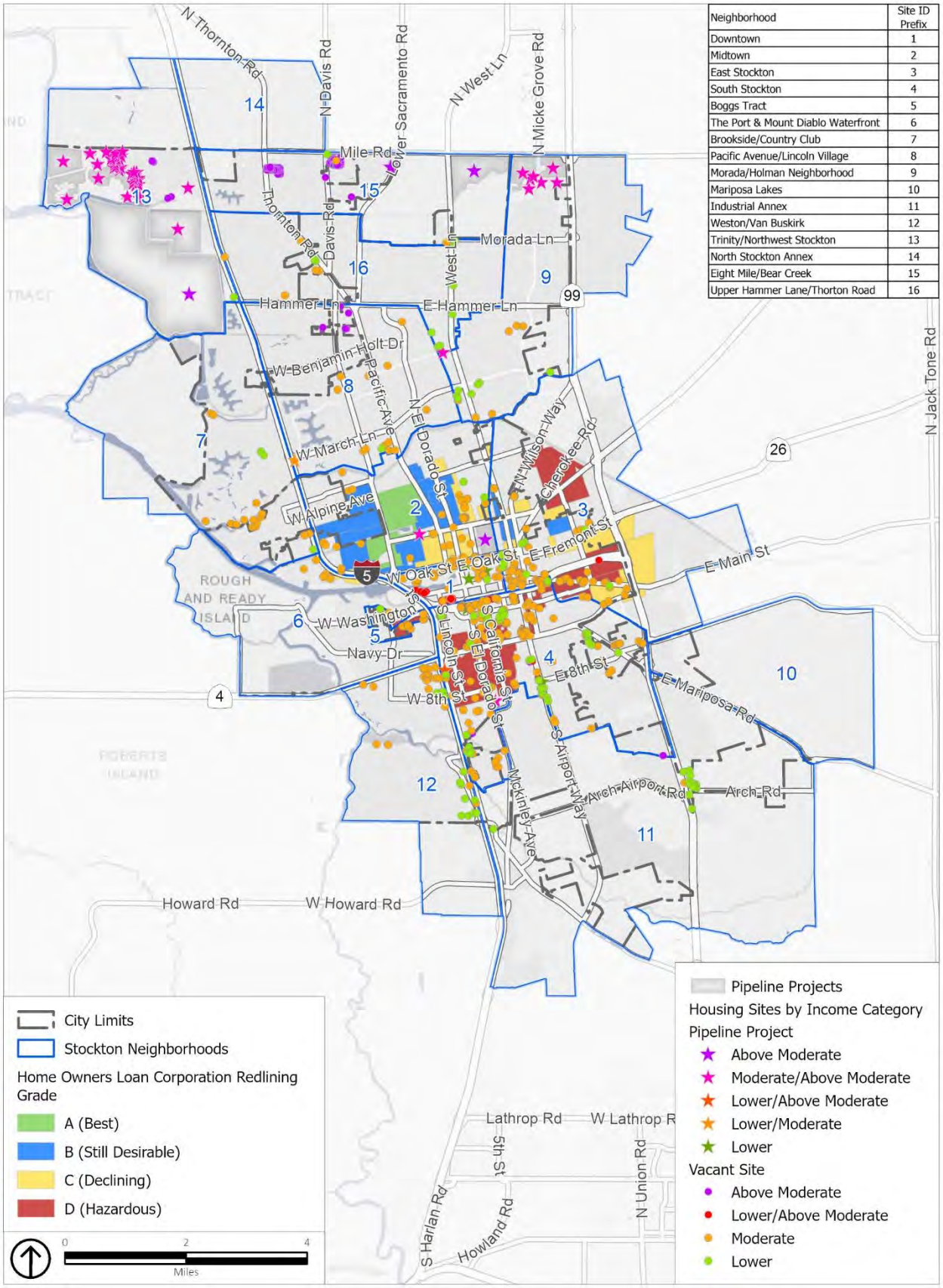
A variety of historical practices and policies resulted in past and present patterns of segregation. Some urban renewal activities contributed to the segregation of lower income communities of color in certain sections of Stockton—for example, the cross town SR-4 freeway; land use decisions to construct affordable housing complexes in existing lower-income areas, including the Greater Downtown, South Stockton, and along the circulation corridors extending northward from the Midtown neighborhood where the first residential neighborhoods across the Calaveras River were constructed; and prioritizing newer market-rate single-family developments in the more peripheral western, northern, northeastern, and southwestern edges of the city. Physical features in the city also contributed to creating spatially divided concentrations of income and racially based neighborhoods—particularly the various delta sloughs, creeks, Calaveras River, the port and scattered lake features, roadway infrastructure, and the two Union Pacific Railroad lines with associated rail yards and switching stations. Though these factors did not openly target minority groups, they may have contributed to establishing development patterns that prevented access to opportunities by lower-income households. Local, state, and federal policies have, both directly and indirectly, influenced access to services, amenities, and opportunities for lower-income and non-White households.

As well, nationwide practices of discriminatory land use policies, redlining, and mortgage lending discrimination have presented overt barriers to homeownership and housing options in general for people of color. Redlining refers to the process of delineating neighborhoods deemed "unworthy of private

investment." The Home Owners' Loan Corporation evaluated neighborhoods based on their desirability. Investors categorized neighborhoods as "red" or "yellow" if there was said to be an "infiltration of undesirable populations" or a "lack of homogeneity" (referring to White-only populations), which indicated a declining neighborhood. Once a neighborhood was "redlined," banks refused to grant home mortgages and loans to residents in the area. As shown in **Figure HE-21, Home Owner's Loan Corporation Redlining Grade,** Stockton had historically many red census tracts, most of which were in the South Stockton neighborhood, and yellow census tracts in the northern Greater Downtown and Midtown neighborhoods. Most of the red or yellow tracts correlate with lower-income communities, although north of SR-4 not all tracts are heavily racially or ethnically concentrated.

In order to address historical discrepancies in access to opportunities lower-income households and people of color, the City has included Program 32.

Figure HE-21: Home Owners' Loan Corporation Redlining Grade



Source: University of Richmond, 2021.

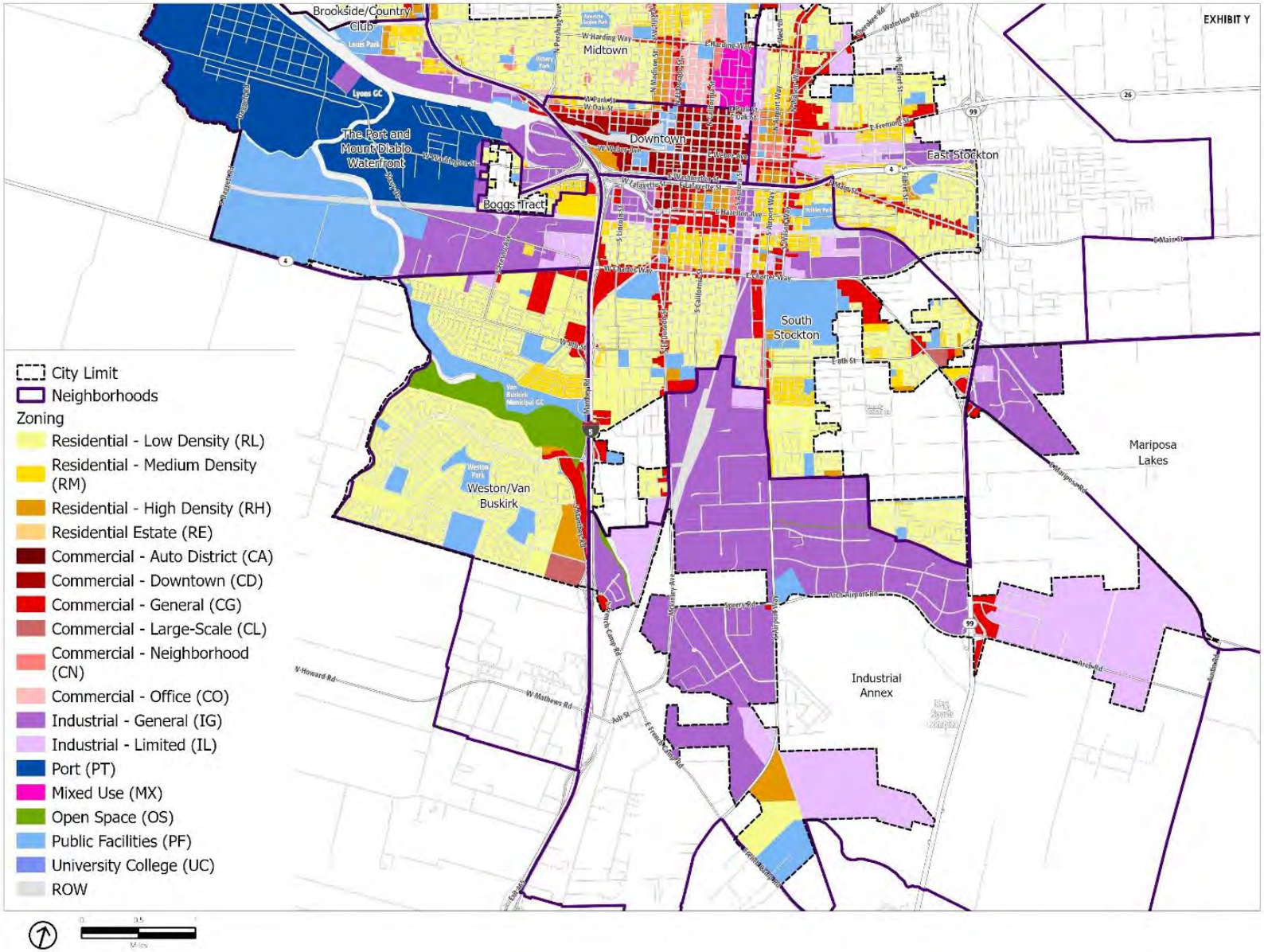
LAND USE AND ZONING PATTERNS

According to the 2016-2020 ACS, 73.1 percent of the housing stock in Stockton is single-family units, inclusive of single-family attached units, indicating a higher level of single-family zoning than in the city of Lodi, yet lower than in the city of Manteca and other San Joaquin County jurisdictions. However, zoning designations change over the years, and land zoned for higher density multifamily units may have been developed with lower densities (single-family or condominium). There is no direct correlation between the proportion of single family units and the percentage of land zoned for single-family residential. Duplex, triplex, and fourplex unit types make up approximately 8.1 percent of Stockton's housing units. Conversely, 17.7 percent of the housing stock consists of multifamily units in structures of five or more units, with 32.9 percent of the larger multifamily units in structures of 50 or more units. Mobile homes comprise only 1.1 percent of the housing stock, with the majority of the units in the South Stockton and East Stockton neighborhoods.

While in most communities single-family zoning can create desirable places to live, higher entry costs associated with this housing type can pose a barrier to access for low- and moderate-income households, and in turn restricting access to economic, educational, and other opportunities that are available in higher-resource communities. Stockton consists of a mix of resource designations and therefore offers varying levels of access to education, services, employment, and business resources to residents regardless of product type. As well, while almost three-quarters of the housing stock are single-family units, the split between renters and homeowners is roughly equivalent, at 50.1 and 49.9 percent, respectively, indicating that a portion of the rental housing stock is single-family units. As discussed previously, the higher resource tracts are largely concentrated in the northern part of the city. Tracts with High Segregation and Poverty designations are clustered in Greater Downtown Stockton and correlate to the concentration of lower median household income block groups and the R/ECAPs discussed earlier. Also, most of the tracts to the south of East Harding Way are identified as either High Segregation and Poverty or Low resource. Further, while market values of homes in Stockton are generally lower than in Manteca and Lodi, and while older, smaller units may have historically provided opportunities for home ownership for lower-income households, in the current market, the average single-family home price has risen to over $420,000. Based on data presented in the Stockton Housing Action Plan Market Conditions Report, 2022, even the average home in Stockton would likely be over most of the moderate-income households' ability to pay.

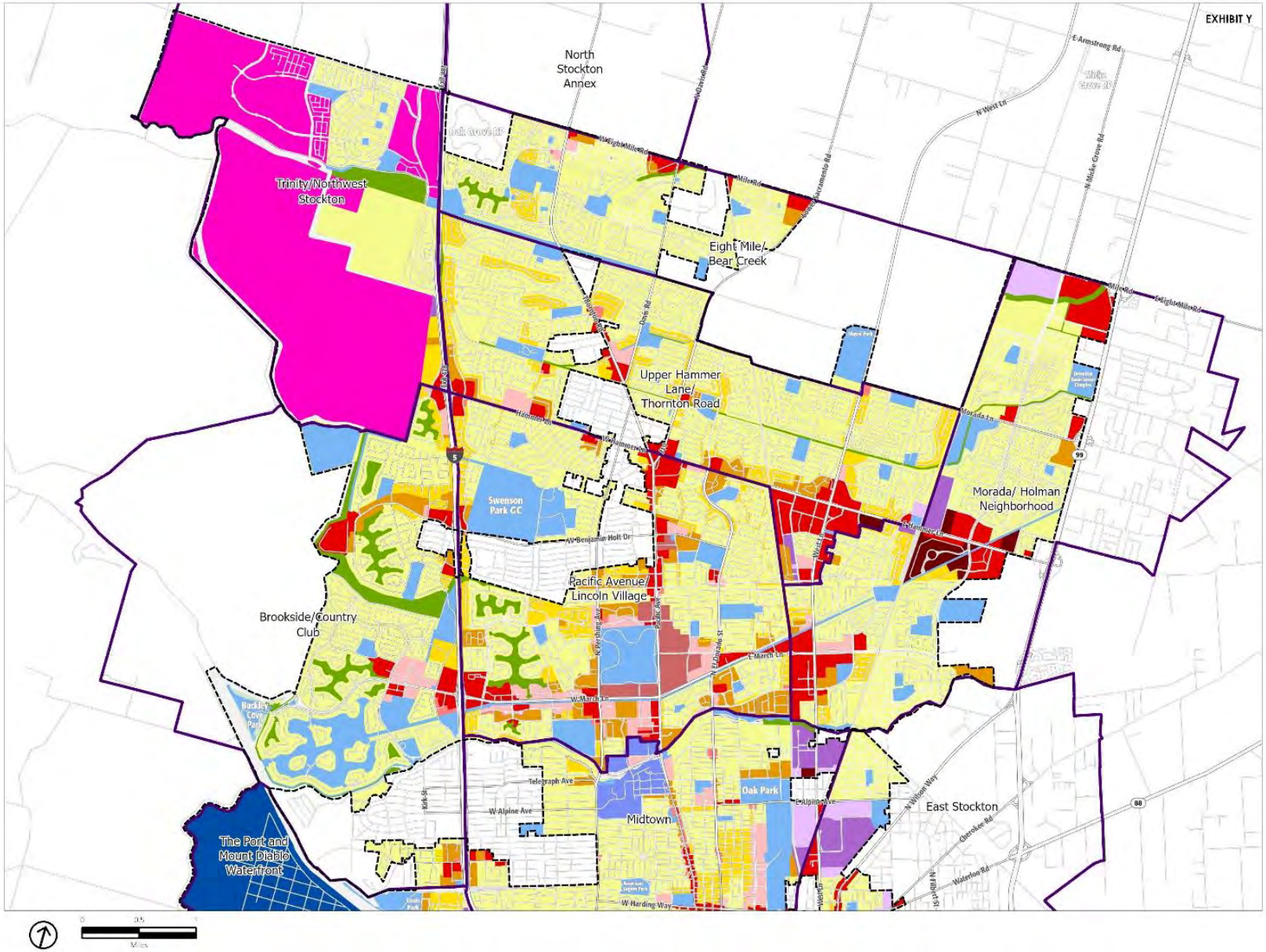
As shown on **Figure HE-22, Zoning in Stockton**, there are four base residential zones: Residential Estate (RE), Residential Low Density (RL), Residential Medium Density (RM), and Residential High Density (RH). Additionally, the Mixed-Use District (MX) is intended to apply to large properties of at least 100 acres that can accommodate a wide range of land uses. A master development plan is required for each MX zoning district to identify specific allowable land uses and development regulations. High density residential is also permitted at densities up to 136 du/ac in four of the commercial zones of the city (only in the Downtown Core area) with the intent of encouraging a mixture of high intensity uses, including high density residential. As shown on **Figure HE-22**, single family zones are predominantly in the outer and central areas of the city, with higher intensity uses along major transit corridors, adjacent to commercial nodes, in the vicinity of the three major educational campuses in the city, and Downtown.

Figure HE-22a: Zoning in Stockton (South)



Source: City of Stockton, 2023.

Figure HE-22b: Zoning in Stockton (North)



Source: City of Stockton, 2023.

Affordable housing development typically requires high-density zones to support construction; therefore, zones limited to single dwelling units on each lot do not support affordable development. In Stockton, the higher density zones permitting multifamily unit types are clustered in certain parts of the city and tend to correlate to the timeline of growth in the city and the advent of Housing Element RHNA requirements, although the zoning depicted by Figure HE-22, Zoning in Stockton, has been updated to reflect recent zone changes to allow multifamily in more areas of the city. North of the Calaveras River, the highest-density multifamily zones are interspersed within planned developments, master planned developments, and specific planned areas west of I-5 in the Brookside/Country Club and Trinity/Northwest neighborhoods; in the Quail Lakes Planned Development in the Pacific Avenue/Lincoln Village neighborhood; and adjacent to General Commercial uses along the major arterials in the Eight Mile/Bear Creek and Morada/Holman neighborhoods that have been more recently developed or are in planning/entitlement stages. The above-described high-density zones correspond with higher-income block groups and higher TCAC/HCD designations. In the developed Brookside Country Club and Quail Lake gated and golf course communities, the higher density enclaves were included as high-end market rate condominium and rental complexes, offering housing mobility opportunities primarily to higher-income households. However, the larger tracts identified along the developing periphery of the city will foster housing mobility opportunities for lower-income households into higher resource areas.

Additional high-density zones north of the Calaveras River are found in the central Pacific Avenue/Lincoln Village neighborhood in the vicinity of the Sherwood Mall, Weberstown Mall, and between March Lane and the Calaveras River, and along major arterials in the lower portion of the Morada/Holman and Upper Hammer Lane/Thornton Road neighborhoods. This distribution is consistent with a pattern of multifamily housing primarily in Low and Moderate resource areas, corresponding to affordable assisted multifamily complexes, predominantly Hispanic populations, and concentrations of lower-income households. The data suggest that the multifamily housing in the more mature portions of the city north of the Calaveras River, which tend to be more affordable, is limited to areas with other factors that result in a lower quality of life.

High-density zoning is also found in the Downtown, radiating out from the Greater Downtown area into the four neighborhoods surrounding Downtown, also consistent with the pattern higher-density housing types primarily in Low and Moderate resource areas and corresponding to affordable assisted multifamily complexes, predominantly Hispanic populations, and concentrations of lower-income households in the more historically developed portions of the city. Revitalization efforts are focusing on providing mixed-income housing mobility opportunities to meet the needs of current residents at risk of displacement and foster integration of higher-income households to support the improvement of the TCAC/HCD resource designation. Sizeable tracts of vacant and recently developed high-density zoning are identified in the southern end of the Weston/Van Buskirk neighborhood as part of the Weston Ranch Planned Development, designated Low resource.

PUBLIC AND PRIVATE INVESTMENT PATTERNS

Public and private investment typically includes construction, maintenance, and improvements to public facilities, including infrastructure, acquisition of land, and major equipment. Historically, investment by the City has been prioritized based on need and available funding, which has prevented disinvestment in any particular area of the city.

The City's current prioritization process for capital improvement funding includes an initial review of projects that considers fiscal consequences; health and safety effects; community economic effects; feasibility; implications of deferring the project; amount of uncertainty and risk; and environmental, aesthetic, and social effects. The following are projects the City has recently completed or is currently constructing:

- Roadway Improvements. To improve connectivity to public transit at the Cabral Station, Miner Avenue street improvements were completed between Center Street and Aurora Street. The project included reduction in the number of vehicle travel lanes from two lanes to one lane in

each direction with buffered bicycle lanes; construction of a traffic-calming roundabout; and signal, lighting, and median landscape improvements. To reduce congestion and improve mobility and safety for vehicles, bikes, and pedestrians, the City is replacing a four-way stop at Lincoln Street and Eighth Street by constructing a roundabout and reducing traffic lanes at the intersection.

- Roadway Improvements: Weston Ranch Crossings. To increase safety for pedestrians and bicyclists at nine crossing locations in Weston Ranch, improvements included combinations of flashing beacons; high-visibility crosswalks; signage; curb ramps; and other changes along the curbs, gutters, and sidewalks, depending on traffic and pedestrian needs at each crossing.
- Sidewalk, Curb, Median, and Gutter Repair. To foster revitalization in the downtown and environs, the project removes and replaces concrete sidewalks, curbs, and gutters that have been damaged by tree roots at various locations citywide. To maintain safety and roadway conditions along major arterial roadways, the City will complete the reconstruction of the median along two major sections of Pacific Avenue between Hammer Lane and the Calaveras River Bridge.
- ADA Upgrades. To improve safety and accessibility throughout the city, all sidewalk and roadway circulation projects include bringing infrastructure up to ADA standards.
- City Hall Renovations and Relocation. To better serve the residents of the city and consolidate the various departments currently in various buildings downtown, the New City Hall Renovations and Relocation project site is at 501 and 509 W. Weber Ave., at the northwest corner of Weber Ave. and Lincoln St. The project will renovate two 5-story buildings and includes both on- and off-site improvements. When completed, the majority of City departments currently in various buildings will relocate to the renovated buildings.
- Public Recreation Facilities. To provide quality public recreation amenities to all residents, the City will complete a total renovation of 22.3-acre McKinley Park, the largest municipal park in South Stockton. To provide quality recreation and community services for all residents, the City has begun construction of the future multifunction Northeast Stockton Library and Community Center at 1461 Morada Lane next to McNair High School, at the corner of West Lane and Ronald McNair Way.
- Bicycle and Trails Improvements. To broaden the city's bicycling network and encourage more to utilize nonvehicular transportation, the City is introducing the Central Stockton Road Diet Project. The plan includes placing new markings and stripes and creating Class II bike lanes on several streets in central Stockton, with the goal to provide a low-stress bicycling alternative to Harding Way. To promote safer, healthier travel options, the March Lane Bike Path project will improve the bicycle and pedestrian path, providing a wider cross-section. Improvements will be made midblock and at intersections, with gap closures and enhanced connections to adjacent uses. To support sustainable mobility and growth and ensure the next phase of bicycle infrastructure can be funded and implemented, the City is updating its Bicycle Master Plan
- Alexandria Culvert. The City of Stockton is working to replace the culvert at Alexandria Place and Five Mile Slough to improve public safety and reduce potential flooding impact.
- Safe Routes to School. The City will continue to fund and work with the following schools: John Marshall Elementary, Taylor Elementary, Pittman Elementary, Roosevelt Elementary, McKinley Elementary, and George W. Bush Elementary to implement improvements and promote Safe Routes to School in an effort to improve access to school and safety for children and parents.

Priority for projects is based on what will result in the greatest community benefit, mitigate existing issues, and address public demand and need. The City is focusing on creating more public facilities, public safety, and recreational amenities for residents; expanding the capacity of the water, sewer, and roadway infrastructure network; and preparing for expansion of the city's development of industrial, commercial, and residential uses. There has not been any disproportionate investment or disinvestment in a particular area of the city over the past several decades. In addition, the City will continue to implement Program 4 to address future projects that address community needs. The annual CIP

provides funding for new facilities to handle expanding growth and targets the central older core of the city with roadway improvements, parks improvements, and general maintenance as well as infrastructure rehabilitation throughout the city.

LOCAL KNOWLEDGE

The City has undertaken a number of Downtown revitalization projects over the past two decades to refocus attention on its historical significance, promote higher-density opportunities, and maximize the Port of Stockton amenities, including: Robert J. Cabral Train Station, Stockton Arena and Banner Island Ballpark waterfront recreation amenities, City Centre Cinema, ACE Train Station, University Plaza Waterfront Hotel mixed-use project, Weber Point Events Center, historic Hotel Stockton restoration, and the San Joaquin County Courthouse. Strengthening the core Downtown neighborhood is envisioned as an impetus to foster revitalization and infrastructure investment throughout surrounding neighborhoods, as well as along the major transportation routes and commercial corridors. In addition, an overview of significant development projects and plans that have shaped the growth and character of the city, contributed to place-based revitalization, and fostered residential opportunities, some of which are currently on-going and are a source of sites included in the identified unit capacity to meet the RHNA, provides context for the policies and programs developed to further fair housing,

Neighborhood Action Plans

Neighborhood Action Plans are being developed for the South Airport Way Corridor, Little Manila/Gleason Park, and Cabral/East Cabral. Planning efforts will focus on eliminating barriers to housing construction and will result in recommended actions and strategies for each of the three Neighborhood Areas.

The South Airport Way Corridor, Little Manilla/Gleason Park, and Cabral/East Cabral are three catalytic areas that can benefit from additional planning efforts. There have been two planning studies for the Robert J. Cabral Station Neighborhood—A Plan for Revitalizing East Downtown Stockton, 2005 and a 2008 update. A portion of the Cabral/East Cabral Neighborhood Area is in the planning area of the San Joaquin Regional Rail Commission. This planning area encourages future transit-oriented housing to complement the expansion of rail services. A Gleason Park Neighborhood Master Revitalization Strategy was completed in 1999. The neighborhoods are in the 2040 Envision Stockton General Plan "Preferred Scenario" for corridors, where "exemplifying sites in need of investment to fuel positive change" includes "the eastern part of Downtown and South Stockton."

In 2020, the California Strategic Growth Council awarded a $10,834,490 Transformative Climate Communities (TCC) Grant to the City. This grant includes multiple partners and projects to reduce greenhouse gas emissions, strengthen the local economy, and improve public health for communities in the South Stockton area. Most of the Neighborhood Areas fall within the TCC project area.

All three Neighborhood Areas are in the South Stockton Promise Zone, where federal and local partners collaborate to boost economic activity, improve educational opportunities, reduce crime, and leverage private investment to improve the quality of life in these areas. The three Neighborhood Areas are also part of a Stockton Opportunity Zone, a program that offers tax-incentive programs for investment in low-income communities through a Qualified Opportunity Fund. HCD Opportunity Maps display all three Neighborhood Areas as Low resource areas. Resources can include access to adequate infrastructure, employment, and housing.

Regional Smart Growth TOD Plan

The Regional Smart Growth TOD Plan aims to shape future growth throughout San Joaquin County to put the region on a path to environmental sustainability by promoting TOD and infill development. The City's revitalization programs, General Plan policies and actions, and Cabral/East Cabral Neighborhood Plan facilitate objectives of this plan.

The City continues to process applications for residential subdivisions and projects throughout the city, annexing parcels at the periphery of the city that have potential for affordable housing development in commercial mixed-use and high-density residential zoning, completing Downtown improvements that foster high-density mixed-

income residential projects, and promoting opportunities for affordable housing throughout the city. The total number and the share of multifamily unit permits as a proportion of total permits has increased in recent years. In 2021, over one-third of the city's residential building permits were for units in multifamily structures, indicating a shift toward construction of smaller units in multifamily developments.

ENFORCEMENT AND OUTREACH CAPACITY

COMPLIANCE WITH FAIR HOUSING LAWS

Fair housing laws at the federal, state, and local level protect certain characteristics from housing discrimination. These protected characteristics include race, color, national origin, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, ancestry, veteran or military status, source of income, genetic information, familial status, and disability. Fair housing laws in practice may be tenant protections, immigration rights, and other protective laws as required by the jurisdiction. Stockton enforces and complies with fair housing laws and regulation through a multifaceted process—regular review of City programs and impediments to fair housing choice, compliance with state and federal law, and referral of fair housing complaints to San Joaquin Fair Housing.

In addition, the City demonstrates compliance or intention to comply with fair housing laws through the following:

- The City currently allows projects to take advantage of density bonuses and incentives and concessions in compliance with Density Bonus Law (Government Code, Sections 65915 to 65918.) The City has included Program 17 to update the density bonus ordinance to be consistent with recent State law as needed.
- The City has identified a surplus of sites available to meet the County's RHNA allocation which complies with the No-Net-Loss (Government Code Section 65863). In total, the city's surplus unit capacity is 10,495, composed of 1,437 lower-income units, 767 moderate-income units, and 8,291 above moderate-income units.
- Emergency shelters are allowed in the Residential High-Density, Commercial Office, Commercial General, Commercial Downtown, and Industrial Limited districts with a Commission Use Permit. The development code does not impose any further restrictions or requirements. The City also allows emergency shelters "by right" (i.e., without a commission use permit or other discretionary approval) in the Industrial Limited (IL), Industrial General (IG), and Public Facilities (PF) districts.
- The City currently complies with state law regarding SB 35 (Government Code Section 65913.4) although it does not have a written process established for processing projects under SB 35. To further demonstrate compliance, the City has included Program 19 to establish a process that specifies the SB 35 streamlining approval process and standards for eligible projects. The established procedure will aid in minimizing the review time required for development processes and, in turn, reduce costs to developers, which may increase housing production in the city.
- The City will continue to comply with SB 330 (Government Code Section 65589.5), relying on regulations in the law for processing preliminary applications for housing development projects, conducting no more than five hearings for housing projects that comply with objective general plan and development standards, and making a decision on a residential project within 90 days after certification of an environmental impact report or 60 days after adoption of a mitigated negative declaration or an environment impact report for an affordable housing project.

FAIR HOUSING COMPLAINTS

As part of enforcement efforts, Stockton residents are served by multiple fair housing service providers, including San Joaquin Fair Housing Association and the Housing Authority of San Joaquin County. The Housing Authority refers tenants to the San Joaquin Fair Housing Association on their website. The San Joaquin Fair Housing Association provides housing counseling services, tenant/landlord services, conducts fair housing investigations, and operates periodic fair housing audits

throughout the county. As well, they maintain an inventory of affordable housing resources developed by Visionary Home Builders, assist with financial education and navigating the homebuying process, provide rental counseling and resident services, including job search, teen center, digital literacy program, and other services for residents of Visionary Home Builders' affordable communities.

Fair housing providers identified that concentrations of low-income and non-English speaking populations are particularly vulnerable to displacement, isolation, and discrimination because they have more limited resources when securing housing. Fear of retaliation is a common complaint among tenants with limited resources at their disposal. The experiences reported by fair housing providers, though not isolated to Stockton residents, indicate a need for greater tenant protections; assistance with finding and securing housing; and education for landlords, property managers, and tenants regarding fair housing rights and responsibilities. The City currently contracts with San Joaquin Fair Housing Association for fair housing services and will meet with their staff to implement strategies to improve conditions for low-income, immigrant, and linguistically isolated populations. Actions will include audits of housing providers for discriminatory behavior, multilingual community workshops, and education to increase awareness of available services (Program 30).

During consultations, San Joaquin Fair Housing Association staff asserted that the lack of affordable housing is one of the greatest problems its clients face, and that the largest number of discrimination cases are related to disability. This includes failure to meet reasonable accommodation requests or unit repairs. Lower-income residents are more likely to be burdened by unhealthy or unsafe housing conditions than higher-income residents due to the shortage of affordable housing in Stockton. The City's goal of producing more affordable housing for residents with special housing needs, including people with disabilities and low-income families, will help address this need (Programs 25, 26, 27). The City will also pursue funding to provide low-income community members with financial assistance for repairs and accessibility improvements (Program 16).

HUD's Office of Fair Housing and Equal Opportunity (FHEO) reported that 106 cases were filed by residents of Stockton between January 2013 and April 2021. Several complaints alleged discrimination on multiple bases. Of these cases, the majority of cases were closed following no-cause determinations or were withdrawn. Of the nine cases showed cause, the most common allegation was discrimination on the basis of disability (six) and race (three), with two citing familial status, one national origin, and one based on sexual orientation. The City has identified Program 30 to ensure residents and housing providers are aware of fair housing laws, rights, and requirements as well as resources available to residents should they experience discrimination. Program 30 also calls for the City to work with local and regional fair housing providers to facilitate training for housing providers to prevent discriminatory actions and behaviors.

SITES INVENTORY AND FAIR HOUSING ANALYSIS

The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. Government Code Section 65583(c)(10)(A) added a new requirement for housing elements to analyze the location of lower-income sites in relation to areas of high opportunity. As discussed throughout this Assessment of Fair Housing, TCAC and HCD have designated a large proportion of Stockton as low resource and Areas of High Segregation and Poverty in the central and southern portions of the city. High and Highest Resource designations are found within the western, northern and eastern census tracts, as well as segments of Pacific Avenue/Lincoln Village and Midtown neighborhoods. Moderate resource tracts are centrally located, interspersed in the Upper Hammer Lane and East Thornton neighborhood, western and southern portions of the Morada Holman neighborhood, Midtown, and in the southern portion of the city, in the Weston Ranch neighborhood.

Figure HE-23, Census Tracts in Stockton and Table HE-48, Distribution of RHNA Capacity by Census Tract present the unit capacity by census tracts in the city, and the existing conditions of each tract as they relate to indicators of fair housing.

This distribution of sites has been identified based on available land that is suitably zoned for residential development. Table HE-48 presents how the distribution of sites by income will help to combat existing fair housing issues in Stockton through facilitation of mixed-income neighborhoods, providing opportunities for additional housing opportunities in the higher resource areas, thus reducing concentrations of affluence and promoting housing mobility, and providing additional housing opportunities in areas that will reduce displacement risk resulting from overpayment and overcrowding.

Figure HE-23: Stockton Census Tracts

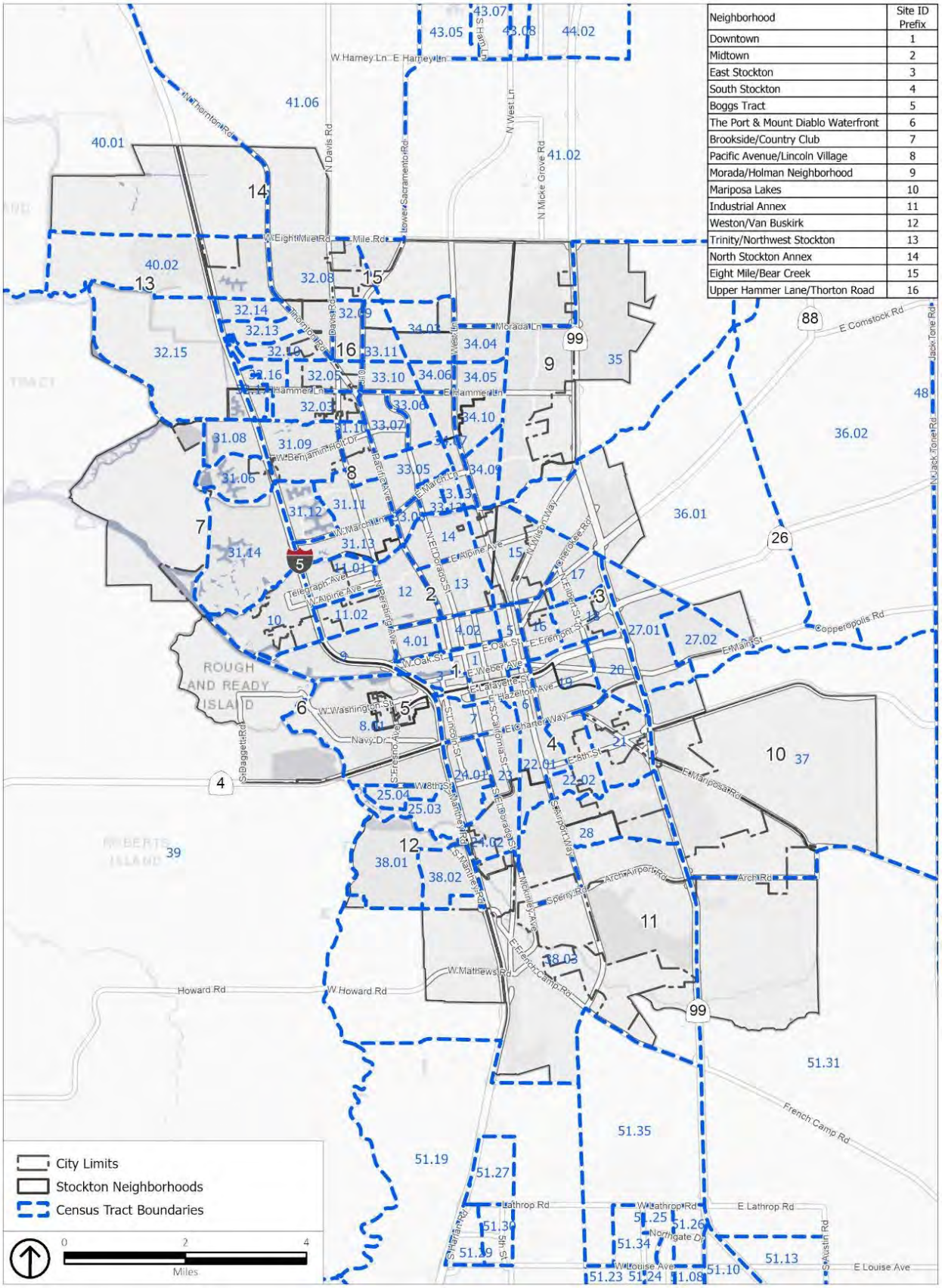


Table HE-48 Distribution of RHNA Capacity by Census Tract

CENSUS TRACT	EXISTING HOUSEHOLDS	RHNA CAPACITY			AFFH INDICATORS												
					INTEGRATION AND SEGREGATION						ACCESS TO OPPORTUNITY			DISPLACEMENT RISK			
		LOW	MODERATE	ABOVE MODERATE	MEDIAN INCOME	POVERTY RATE	LOW- TO MODERATE-INCOME POPULATION	NON-WHITE POPULATION	DISABILITY RATE	R/ECAP STATUS	RESOURCE DESIGNATION	JOBS PROXIMITY INDEX	CALENVIRO SCREEN PERCENTILE	OVER-CROWDING RATE	RENTER OVERPAYMENT RATE	HOMEOWNER OVERPAYMENT RATE	% RENTER HOUSE-HOLDS
1.00	1,730	605	372	111	$16,269	47.2%	94.0%	86.3%	31.1%	Yes	High Segregation and Poverty	96	99.9	24.8%	62.5%	100.0%	98.1%
3.00	867	114	273	437	$19,200	37.7%	65.4%	85.6%	25.1%	Yes	High Segregation and Poverty	95	99.7	14.5%	66.2%	25.6%	91.0%
4.01	1,334		4		$55,197	12.4%	36.6%	61.1%	20.8%	no	High Resource	93	77.9	5.1%	56.9%	22.7%	58.6%
4.02	1,617	50	98	360	$22,584	33.9%	72.1%	77.1%	19.6%	Yes	High Segregation and Poverty	98	91.6	9.9%	66.2%	49.7%	89.0%
5.00	754	94	157		$24,700	35.0%	82.4%	84.8%	18.0%	Yes	High Segregation and Poverty	94	86.7	29.5%	63.1%	70.6%	74.1%
6.00	543		150		$27,396	29.9%	55.7%	93.8%	16.9%	yes	High Segregation and Poverty	84	94.4	14.1%	69.8%	62.5%	83.4%
7.00	1,220	249	166	18	$32,836	37.6%	53.2%	91.9%	25.4%	yes	High Segregation and Poverty	89	99.9	24.6%	61.8%	41.2%	62.3%
8.01	1,687	244	227		$60,160	17.4%	56.3%	96.2%	7.7%	no	Low Resource	82	99.4	11.2%	49.0%	42.9%	51.0%
9.00	1,930		77		$48,113	28.7%	55.6%	79.4%	11.4%	no	High Segregation and Poverty	58 to 73	97.3	7.0%	59.6%	28.5%	56.8%
10.00	1,962	59	92		$52,965	16.1%	34.7%	68.1%	12.6%	no	Moderate	59 to 64	85.2	3.6%	61.8%	45.5%	47.0%
11.01	1,806		8		$55,958	13.9%	35.6%	64.9%	22.5%	no	Low Resource	86	63.9	12.6%	47.3%	30.1%	44.2%
11.02	1,940		11		$51,630	20.3%	55.7%	65.6%	7.4%	no	Low Resource	67	60.1	2.1%	45.3%	26.8%	50.4%
12.00	1,734		4	18	$74,571	11.5%	55.6%	45.0%	8.6%	no	High Resource	94	29.6	3.7%	42.3%	23.6%	36.2%
13.00	1,900	180	42		$51,507	12.0%	58.7%	72.2%	12.0%	no	High Resource	92 to 95	71	9.0%	50.8%	20.7%	48.8%
15.00	2,299		8		$48,726	17.8%	59.3%	85.7%	13.2%	no	Moderate Resource	81 to 88	90	16.0%	55.1%	47.1%	45.0%
16.00	605	84	11		$35,479	27.8%	45.3%	76.0%	18.7%	no	Low Resource	88	86.6	9.1%	61.8%	64.4%	64.6%
18.00	1,091	46	60		$49,450	21.3%	67.1%	83.0%	15.7%	no	Low Resource	66	94	20.4%	48.6%	13.7%	59.8%
19.00	1,428	16	42		$31,066	33.2%	61.5%	93.9%	11.2%	yes	High Segregation and Poverty	62 to 81	96.7	23.5%	73.0%	37.0%	66.7%
20.00	1,126	9	24	1	$26,987	36.3%	71.3%	92.1%	16.5%	no	High Segregation and Poverty	49 to 59	97.2	16.0%	59.8%	36.0%	59.7%
21.00	1,547	304	153		$40,544	22.7%	70.0%	97.7%	11.1%	no	Low Resource	42	87.8	11.7%	60.0%	45.8%	40.3%
22.01	808	139	15	8	$29,020	41.1%	71.9%	97.2%	12.9%	yes	High Segregation and Poverty	53 to 56	97.1	8.6%	60.2%	35.9%	52.8%
22.02	1,377	29			$38,141	31.5%	65.7%	97.1%	12.9%	yes	High Segregation and Poverty	50	80.8	18.8%	60.6%	48.1%	58.7%
23.00	1,357	25	50	104	$39,423	25.5%	68.6%	96.8%	16.6%	yes	High Segregation and Poverty	53 to 71	97.2	17.7%	56.1%	44.9%	70.3%
24.01	1,257	129	47	20	$41,587	31.8%	68.0%	92.1%	13.7%	yes	High Segregation and Poverty	52 to 72	96.3	18.6%	63.3%	24.9%	54.2%
24.02	584	125	59		$32,317	26.2%	63.6%	95.6%	21.4%	no	Low Resource	45 to 54	97	18.0%	66.0%	26.3%	45.9%
25.03	661		16		$25,179	43.5%	63.1%	90.7%	21.3%	no	High Segregation and Poverty	36	86.8	4.6%	44.0%	12.3%	71.9%
28.00	1,550		78	2	$54,082	13.5%	53.7%	91.6%	10.2%	no	Low Resource	57 to 61	88.4	16.2%	49.9%	47.3%	34.9%
31.09	2,146		10		$66,025	9.3%	33.8%	62.8%	16.9%	no	Highest Resource	79	76.2	4.0%	55.7%	32.1%	47.0%
31.10	1,576		1		$50,893	21.8%	56.6%	64.4%	13.2%	no	High Resource	80	71.5	5.3%	54.7%	22.8%	77.0%
31.11	1,738		1		$44,000	11.2%	46.3%	71.3%	22.8%	no	High Resource	87	72.3	1.9%	58.4%	46.1%	73.7%

CENSUS TRACT	EXISTING HOUSEHOLDS	RHNA CAPACITY			AFFH INDICATORS												
					INTEGRATION AND SEGREGATION						ACCESS TO OPPORTUNITY			DISPLACEMENT RISK			
		LOW	MODERATE	ABOVE MODERATE	MEDIAN INCOME	POVERTY RATE	LOW- TO MODERATE-INCOME POPULATION	NON-WHITE POPULATION	DISABILITY RATE	R/ECAP STATUS	RESOURCE DESIGNATION	JOBS PROXIMITY INDEX	CALENVIRO SCREEN PERCENTILE	OVER-CROWDING RATE	RENTER OVERPAYMENT RATE	HOMEOWNER OVERPAYMENT RATE	% RENTER HOUSE-HOLDS
31.13	2,136	187	33		$36,839	26.7%	67.9%	79.9%	11.9%	no	High Segregation and Poverty	92	89.8	9.5%	64.5%	24.7%	81.5%
31.14	3,614	49	10		$105,766	3.5%	11.6%	52.9%	9.1%	no	Highest Resource	64 to 76	30.8	0.6%	56.8%	31.8%	29.9%
32.03	1,437			11	$73,628	5.9%	29.0%	45.2%	14.9%	no	High Resource	40	62.7	0.0%	70.8%	26.1%	28.3%
32.05	1,364	0	6		$73,700	16.1%	31.8%	61.0%	12.4%	no	Moderate Resource	16	59.3	5.4%	39.0%	19.2%	37.0%
32.08	3,887	26	1	98	$99,975	5.9%	26.5%	76.8%	10.6%	no	Highest Resource	2	49.8	5.9%	46.5%	22.2%	34.3%
32.10	1,040	29	92		$78,375	6.4%	20.1%	63.1%	19.5%	no	Moderate Resource	6	44.4	1.2%	74.4%	24.3%	40.2%
32.13	1,394		6		$54,032	20.2%	38.7%	67.3%	23.3%	no	Moderate Resource	4	59.9	11.1%	51.9%	36.7%	42.4%
32.15	1,736	8	77	7226	$70,060	13.6%	28.6%	65.0%	11.3%	no	High Resource	8 to 12	48.5	2.2%	40.1%	19.9%	70.8%
32.17	953		3		$43,720	29.6%	63.7%	86.0%	14.2%	no	High Segregation and Poverty	10	67.4	21.2%	60.0%	22.3%	77.9%
33.06	1,452		14		$52,946	15.9%	60.8%	82.9%	11.8%	no	Low Resource	54	70.2	7.6%	49.3%	30.5%	56.5%
33.07	1,781		2		$42,939	21.1%	63.0%	77.2%	16.5%	yes	High Resource	74	73.5	5.8%	57.3%	33.4%	75.9%
33.12	913		3		$30,729	41.9%	85.2%	91.1%	13.2%	yes	High Segregation and Poverty	81	68.7	21.8%	60.9%	74.3%	85.3%
34.03	1,180		94		$60,592	25.4%	40.2%	86.8%	16.5%	no	Moderate Resource	7	69.4	16.2%	70.5%	29.0%	40.2%
34.04	1,733	35			$42,056	20.4%	62.5%	84.0%	15.7%	no	Moderate Resource	17	61.7	22.6%	50.1%	39.4%	50.3%
34.05	1,023	9			$54,268	21.7%	59.8%	89.6%	14.8%	no	Low Resource	32	74.6	24.4%	58.0%	41.3%	56.3%
34.07	958	183	9	31	$36,200	27.2%	78.7%	82.2%	14.0%	no	Moderate Resource	50 to 73	74.5	9.2%	64.8%	44.8%	69.3%
34.09	1,342	83	10		$39,527	20.6%	57.2%	86.8%	12.7%	no	High Resource	63	68.2	10.7%	66.4%	55.8%	51.1%
34.10	1,708	7			$59,738	12.4%	45.7%	89.7%	11.8%	no	Moderate	50	62.5	10.9%	54.8%	45.5%	55.0%
35.00	5,947	455	222		$93,529	8.3%	32.4%	76.4%	10.5%	no	High Resource	45	69.4	6.2%	42.8%	29.4%	26.3%
37.00	1,019	327	4		$38,710	27.7%	52.9%	79.5%	19.6%	no	Low Resource	95	93.6	9.8%	43.7%	88.0%	43.2%
38.01	3,119		3		$67,094	13.5%	31.2%	90.4%	11.3%	no	Moderate	15	72.8	3.1%	46.7%	38.4%	37.7%
38.02	1,800	884	172		$74,861	9.7%	28.0%	87.9%	12.3%	no	Low Resource	22 to 26	94.4	3.8%	54.3%	44.4%	43.1%
38.03	1,054	543	20		$53,250	11.2%	44.7%	82.3%	11.6%	no	Low Resource	83	99.2	13.2%	64.0%	41.9%	50.2%
40.02	3,472		216	3,881	$101,319	4.8%	22.8%	60.4%	8.2%	no	Highest Resource	13	45.4	4.2%	38.5%	33.6%	31.7%
41.02	2,342		32	2,035	$91,364	8.1%	26.0%	77.2%	10.7%	no	Highest Resource	16	71.8	5.4%	28.3%	34.2%	19.9%
51.31	1,238	16			$69,864	22.9%	36.1%	56.7%	19.3%	no	Low Resource	64	93.5	12.4%	30.9%	38.2%	37.8%

The City of Stockton includes 174 census tracts. Of these tracts, 56 include viable and available land for residential development that have unit capacity identified to meet and exceed the RHNA. While sites within 24 of the tracts included in Table HE-48 are distributed within only one income category; 21 tracts include both lower- and moderate-income unit capacity; 4 include a mix of moderate- and above moderate-income units, no tracts include a mix of lower- and above moderate-income unit capacity; and 7 identify a mix of all affordability levels (tracts 23.00, 24.01, 34.07, 32.15, 40.20, 300, and 32.08). The identified unit capacity in all tracts are anticipated to be incorporated into neighborhoods with existing infrastructure and capacity to support development.

The largest proportion of the unit capacity is identified in tract 32.15 in the Trinity/Northwest neighborhood of the city, including 31.9 percent of total unit capacity, comprised of 51.5 percent of the above moderate-income units within the Sanctuary and Delta Cove pipeline projects and 2.3 percent of the moderate-income units within the Delta Cove pipeline project. A few lower-income units have been identified outside of the pipeline projects in the vicinity of the Hammer Road interchange with I-5; although this comprises less than one percent of lower-income unit capacity it does provide a housing mobility opportunity in a Highest Resource area. This tract has a current median income at $70,060, a poverty rate of 13.6 percent which is roughly equivalent to the citywide average, and although the majority of the site is vacant, 70.8 percent of current residents are renters, of which 40.1 percent are cost burdened. This tract has a non-White population of 65.0 percent, below the citywide average, with almost equivalent proportions of White non-Hispanic, Asian and Hispanic residents. The introduction of predominantly above moderate-income units into this high resource area of the city will provide housing mobility opportunities for existing and future residents and facilitate a more mixed-income neighborhood, as well as provide additional housing opportunities for moderate-income households, all having access to commercial and service uses and for commuters, direct access to I-5.

Two additional tracts along the northern perimeter of the city include a sizeable distribution (26.9 percent) of the total unit capacity. Tract 40.02 in Trinity/Northwest Stockton identifies 17.9 percent of the total units, including 27.7 percent of total above moderate-income unit capacity within the Crystal Bay (9.1 percent), Westlake at Spanos Park (17.8 percent), and Trinity Parkway Apartments (0.7 percent) pipeline projects and 6.4 percent of moderate-income unit capacity within the above three pipeline projects, supporting an income-integrated neighborhood. Tract 41.02 is encompassed within the Eight Mile/Bear Creek and Morada/Holman neighborhoods east of I-5 at the northern edge of the city, containing 9.0 percent of the total unit capacity within the Tra Vigne, Cannery Row, and Elderberry residential pipeline projects, accounting for 14.5 percent of above moderate-income unit capacity, and 0.9 percent of moderate-income unit capacity. Both tracts are designated as highest resource, with high incomes, low rates of poverty, and non-White populations below the city average. These tracts are primarily developed with single-family units, with renter rates between 31.7 and 19.9 percent, and rates of cost burdened renters and homeowners between 20.0 and 40.0 percent. Similar to tract 32.15, the introduction of predominantly above moderate-income units into this high resource area of the city will provide housing mobility opportunities for existing and future higher-income residents, as well as provide additional housing opportunities for moderate-income households, with access for commuters via I-5 and SR 99. Although there is no lower-income unit capacity identified within these three tracts contributing 26.9 percent of the total unit capacity, the City is determining the potential for requiring affordable units as part of future development agreements when initiating discussions with applicant.

Approximately 16.3 percent of the units are distributed between two adjacent tracts in the Downtown/South Stockton neighborhoods (tract 100 with 4.7 percent of total units, and tract 300 with 3.6 percent of total units) and tract 801 (2.1 percent of total units) located in the Port and Mt. Diablo Waterfront/Boggs neighborhood. The largest quantity of lower-income unit capacity in this area (11.0 percent) is identified in tract 1.00, co-located with 14.3 percent of the moderate-income unit capacity, including three lower-income pipeline projects (Grand View Village, Hunter House Apartments, and La

Passeggiata Affordable Housing) contributing 5.2 percent of the lower-income unit capacity citywide. The Cabral Station Neighborhood Plan and the Little Manila/Gleason Park Neighborhood Plan areas are encompassed within tract 1.00, which is a contributing factor for the extent of unit capacity identified in this tract, and many of the identified sites correspond to the plans' designations of priority sites, focus sites, and opportunity sites. Another 5.4 percent of the lower-income unit capacity is identified in tract 3.00, co-located with 11.1 percent of moderate-income unit capacity. Both tracts are considered R/ECAPS in a High Segregation and Poverty resource designation; have the lowest incomes in the city; an average 40.0 percent rate of poverty; a high concentration of populations of color; over 91.0 percent renter households of which over 62.5 percent are cost burdened; the highest disability rate in the city; and between 14.5 and 24.8 percent of households are overcrowded. As well, the tracts are within the CalEnviroScreen 99th percentile, considered a disadvantaged community based on environmental, pollution burden, and socioeconomic conditions. The City aims to reduce displacement risk and homelessness for households with these additional housing opportunity sites targeting lower-income households, and the integration of 22.4 percent of moderate-income unit capacity will aid in creating a more mixed-income neighborhood to reduce the concentration of households in poverty while providing housing mobility opportunities with access to transit and employment resources. The highest proportion of moderate-income housing mobility opportunities (14.3 percent) are found in tract 1.00.

Additional lower-income unit capacity (6.2 percent) is distributed in the greater Downtown/South and East Stockton neighborhoods in tracts 5.00, 6.00, and 7.00, with 10.1 percent of moderate-income unit capacity distributed within tracts 5.00 and 7.00. These tracts are designated High Segregation and Poverty and are also considered a R/ECAP, with low median incomes, high rates of poverty and concentrations of populations of color. These tracts are comprised predominantly of renter households, of which over 60.0 percent are cost burdened, and homeowners are also cost burdened, with between 41.2 to 70.6 percent overpaying for housing; reflected in high rates of overcrowding. Although the job proximity index is high, similar to the other tracts in the Downtown neighborhood, these tracts are considered a CalEnviroScreen disadvantaged community, and the risk of displacement for many residents is high. While these tracts include affordable housing stock, the high rates of overpayment suggest a shortage of affordable rental resources. The inclusion of lower-income capacity will expand the housing stock to help to reduce existing overpayment and overcrowding conditions contributing toward risk of displacement, and the inclusion of moderate-income units in tracts 5.00 and 7.00 will aid in creating a more mixed-income neighborhood to reduce the concentration of lower-income households, foster place-based revitalization and stimulate improvement of economic outcome and educational attainment performance.

In the Midtown neighborhood, there are five tracts (4.01, 4.02, 9.00, 12.00, and 13.00), that include 3.6 percent of the units, with potential for 4.2 percent of low-income unit capacity, 6.7 percent of moderate-income unit capacity, and 2.7 percent of above moderate-income unit capacity, including University Park and Harding Apartments pipeline projects, and two lower-income sites in the vicinity of California Street and the San Joaquin Catholic Cemeteries. Tracts 4.01, and 4.02 adjacent to Downtown, as well as tract 9.00 west of Pershing Avenue (and bisected by I-5) are designated high segregation and poverty, with tracts 12.00 and 13.00 designated high resource. While tract 4.02 reflects conditions more aligned with the adjacent Downtown, with a median income of $22,584, a poverty rate of 33.9 percent, is considered a R/ECAP, and comprised almost entirely of renter households, of which 66.0 percent are cost burdened; the other tracts have moderate-incomes and lower poverty rates, and a more equal tenure distribution, although over 40.0 percent of renter households are cost burdened in all tracts. The inclusion of University Park pipeline project in Tract 4.02, with 2.6 percent of above moderate-income unit capacity will aid in creating a more mixed-income neighborhood to reduce the concentration of lower-income households in the tract and provide housing mobility opportunities for moderate- and above moderate-income households. As well, sites in tract 13.00 with unit capacity for lower-income households fosters housing mobility and mixed-income opportunities in higher resource areas, and unit capacity in both tracts 9.00 and 13.00 contribute toward

providing additional housing stock toward de-concentration of lower-income households in the Downtown.

Outside of the greater Downtown, 34.9 percent of lower-income unit capacity and 42.8 percent of moderate-income unit capacity is identified in the South Stockton, East Stockton, and Industrial Annex neighborhoods. These neighborhoods generally have low median incomes, high rates of poverty, a proportion of renter households above 40.0 percent, non-White populations comprising over 90.0 percent of the residents and similar socioeconomic conditions associated with other tracts in the city designated High Segregation and Poverty as well as those considered R/ECAPs. However, tracts 38.03 and 51.31 in southern portion of the Industrial Annex neighborhood have a Low Resource designation, median incomes in the moderate range, lower renter to homeowner ratios, and lower rates of cost burdened households, although residential development is more rural in nature and scattered in clusters among industrial uses and undeveloped land. The majority of development potential is identified in adjacent tracts 21.00 and 22.01 in South Stockton along the major South Airport Way and East Charter Way corridors, with 2.7 percent of the total units, including 7.6 percent of the lower-income unit capacity and 4.9 percent of moderate-income unit capacity. The inclusion of the Mobile Homes on El Dorado pipeline project in tract 23.00 introduces above-moderate-income units in a mixed-income project into the neighborhood to foster income integration. The inclusion of lower-income units here provide lower-income housing mobility opportunities and will help to reduce existing overpayment rates (which are more moderate compared to the greater Downtown), and concentration of poverty in the greater Downtown, therefore reducing displacement risk, and the inclusion of moderate- and limited above moderate-income units will advance housing mobility and income-integration with access to industrial employment centers and the airport.

Remaining site capacity (36.4 percent of units) is identified in the tracts north of the Calaveras River, including 11.0 percent of lower-income unit capacity, and 11.0 percent of moderate-income unit capacity. Lower-income unit capacity is generally identified on sites along the West Lane, West March Lane, and Thornton Road corridors to maximize access to commercial, services, medical and public transit resources. The northern central neighborhoods are characterized by low to moderate median incomes, although tracts 35.00, 31.14 and 32.08 have incomes in the above moderate-income category in the eastern Morada/Holman and western Upper Hammer Lane/Thornton Road neighborhoods. Site potential for larger lower-income projects is identified in tract 34.07 in the Upper Hammer Lane/Thornton Road neighborhood, providing 3.3 percent of the total lower-income unit capacity (30.0 percent of the lower-income unit capacity within the northern central neighborhoods), with the potential sites co-located with moderate- and above moderate-income unit capacity for income integrated development. An additional 1.5 percent of the lower-income unit capacity is identified within tract 34.09 in the lower Morada/Holman neighborhood and 0.9 percent in tract 31.14 along March Lane, co-located with moderate-income units to facilitate income integration and provide housing mobility opportunities in a higher-income and higher resource neighborhood. Another node of mixed lower- and moderate-income unit capacity (0.6 percent of lower-income and 2.7 percent of moderate-income unit capacity) is identified in tract 32.10 at the junction of Thornton and Davis Roads.

Within the Upper Hammer Lane/Thornton Road neighborhood, a mix of unit potential at all income levels has been identified in tract 32.08 in a highest resource neighborhood which fosters income integration housing mobility opportunities at all income levels. Tract 32.08 has one of the highest median incomes and lowest poverty rates in the city, a primarily homeowner tenure, and moderate rates of renters experiencing a cost burden in comparison to the city average. Although less than one percent of the lower-income unit capacity is identified in this tract, it does provide housing mobility opportunities in a higher resource area while contributing towards a reduction in the concentration of lower-income households and displacement risk in other areas of the city. Similarly, 0.9 percent of the lower-income unit capacity, co-sited with 0.3 percent of moderate-income unit capacity, is identified in tract 31.14 in the Brookside/Country Club neighborhood, providing income integration and

housing mobility opportunities in a Highest Resource area.

Overall, in those tracts with moderate and above median incomes, the identification of lower-income unit capacity provides housing mobility opportunities for lower-income households which may have higher environmental, educational outcome or economic outcome rankings, while helping to reduce concentrations of poverty and lower-income populations in more socioeconomically impacted areas of the city. Conversely, the inclusion of moderate- and above moderate-income sites in lower performing tracts is to facilitate income-integration and combat patterns of concentrated poverty.

The city will encourage higher density and affordable housing development in areas with higher incomes and access to resources by promoting the use of density bonus for affordable housing in higher-income and resource areas, and targeting the construction of ADUs in higher-income single-family neighborhoods including Brookside/Country Club, Weston Ranch, Eight Mile/Bear Creek, Midtown around the University of the Pacific (between I-5 and Pacific Avenue's "Miracle Mile"), western Upper Hammer Lane/Thornton Rd, and eastern Morada/Holman to promote access to resources and mobility opportunities for lower-income households, prioritizing new infill and development of vacant land opportunities in higher-income neighborhoods. As well, the City will determine the potential for requiring affordable units in development agreements when initiating discussions with applicant to facilitate mixed-income neighborhoods and provide lower-income households increased access to more positive educational, economic and environmental health outcomes in newly developing areas.

To confirm whether the sites identified in the Housing Element inventory will affirmatively further fair housing, the City examined the TCAC/HCD opportunity area map as well as specific geographic patterns of resources. While the City of Stockton includes a range of resource designations by TCAC and HCD with fairly distinct distribution patterns, additional indicators are evaluated to determine whether the sites inventory affirmatively furthers fair housing.

Figures HE-24 through HE-35 compare the total unit capacity to citywide indicators of fair housing for a comprehensive comparison of how the sites inventory will influence existing patterns. For the purpose of this analysis, "vacant" refers to sites that are currently undeveloped without plans for development and "pipeline projects" are projects that are entitled or pending where proposed number of units and proposed affordability of units are known.

POTENTIAL EFFECT ON PATTERNS OF INTEGRATION AND SEGREGATION

Capacity for 23,168 units, including 5,450 lower-income, 3,339 moderate-income, and 14,379 above-moderate income units has been identified to meet the City's RHNA, including estimated ADU capacity. The majority of above moderate-income capacity (97.3 percent) is within approved pipeline project sites, some of which are final phases of larger developments.

As shown on Figures M1 through M28 in Appendix A, and Table HE-48, Distribution of RHNA Capacity by Census Tract, sites identified to accommodate the lower-income RHNA are primarily located in the Downtown and southern portion of the city where prior analysis has indicated the risk of displacement is highest for residents that currently may face a shortage of affordable options. Approximately 23.8 percent of the lower-income units are identified within the South Stockton neighborhood; and 10.8 percent in the Downtown. As well, 29.6 percent of the lower-income units are identified in the Weston/Van Buskirk and 6.8 percent in the Industrial Annex neighborhoods, with an additional 4.4 percent within the East Stockton neighborhood. Sites with lower-income units have also been identified in block groups with the Boggs Tract, Eight Mile/Bear Creek, Brookside/Country Club, Trinity/Northwest Stockton, Morada/Holman, Pacific Ave/Lincoln Village, Upper Hammer Lane/Thornton Road and Midtown neighborhoods where displacement risk of lower-income households and persons in poverty has been identified and to provide housing mobility opportunities.

Sites with capacity for 3,285 moderate-income units are mainly located in the central and southern portions of the city, including 32.1 percent of the unit capacity in South Stockton; 2.2 percent in the Port and Mt. Diablo Waterfront neighborhood; 12.0 percent within the Downtown; 10.6 percent in East Stockton; and 11.7 percent in the Weston/Van Buskirk neighborhood. The remainder is spread throughout the city with 8.7 percent of moderate-income units in the Trinity/Northwest neighborhood, 5.1 percent in Midtown, 5.8 percent in the Morada/Holman neighborhood, 3.0 percent in the Brookside/Country Club neighborhood, 2.8 percent in the Eight Mile/Bear Creek neighborhood, 3.3 Percent in the Upper Hammer Lane/Thornton Road neighborhood, 1.9 percent in the Pacific Avenue/Lincoln Village neighborhood, and 0.1 percent in the Industrial Annex..

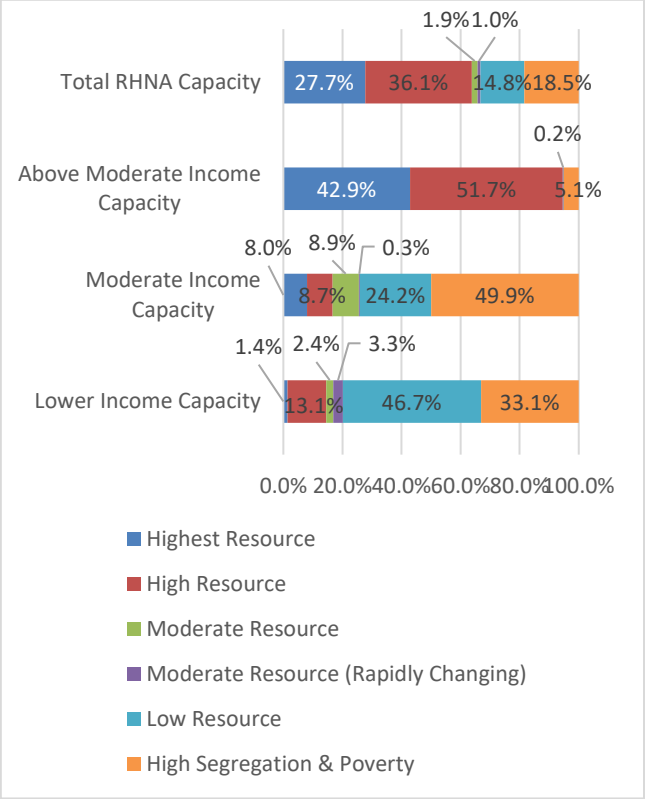
Sites with capacity for 14,361 above moderate-income sites are identified almost exclusively within entitled pipeline projects, the majority of which are located within the Trinity/Northwest neighborhood. Approximately 97.3 percent of above moderate-income unit capacity is identified in pipeline projects as discussed in Chapter 4 within the Trinity/Northwest section of the city (see **Figures M1** through **M28** in **Appendix A**); 10.7 percent in the Tra Vigne development in the Eight Mile/Bear Creek neighborhood, and 3.8 percent within the Cannery Park and Elderberry pipeline projects in the Morada/Holman neighborhood. Above moderate-income RHNA sites are also identified in Midtown, South Stockton and Upper Hammer Lane neighborhoods.

The sites to meet the RHNA identify development opportunities on vacant land. As shown on **Figure HE-24, Percent Unit Capacity by TCAC/HCD Resource Designation**, 18.5 percent of total unit capacity is located within an Area of High Segregation and Poverty, 14.8 percent is within low resource areas, and 63.8 percent of unit capacity is identified within the high and highest resource designations, largely along the west side of the city. A small portion of site capacity is identified in moderate and rapidly changing moderate resource designations.

The majority of the lower-income unit capacity is identified in low resource (46.7 percent) and High Segregation and Poverty (33.1 percent) areas, with the largest distributions in the Downtown, South and East Stockton, Industrial Annex, the northern portion of Weston/Van Buskirk and in the Morada/Holman neighborhood in the Akers area around the intersection of West and Hammer Lanes, which will assist in meeting the existing needs of lower-income households in securing affordable housing. An additional 14.5 percent of lower-income unit capacity is identified in high/highest resource areas, including the Brookside and Midtown neighborhoods, and 2.4 percent in moderate resource areas, which facilitates housing mobility opportunities, including in the Morada/Holman, and Upper Hammer/Thornton Rd. neighborhoods.

As discussed previously, the majority of above moderate-income sites are approved projects, with 42.9 percent in high/highest resource areas, and 51.7 percent in high resource designations in Midtown and scattered sites in the central section of the city facilitating income-integration. The highest proportion of units identified within the moderate resource designation are moderate-income (8.9 percent of moderate-income unit capacity) which facilitates housing mobility opportunities, although limited, with 49.9 percent of moderate-income unit capacity within Areas of High Segregation and Poverty and 24.2 percent within low resource designated areas, thus facilitating income-integration. Otherwise, all sites with the exception of those discussed previously are located within a low resource designation.

Figure HE-24: Percent Unit Capacity by TCAC/HCD Resource Designation

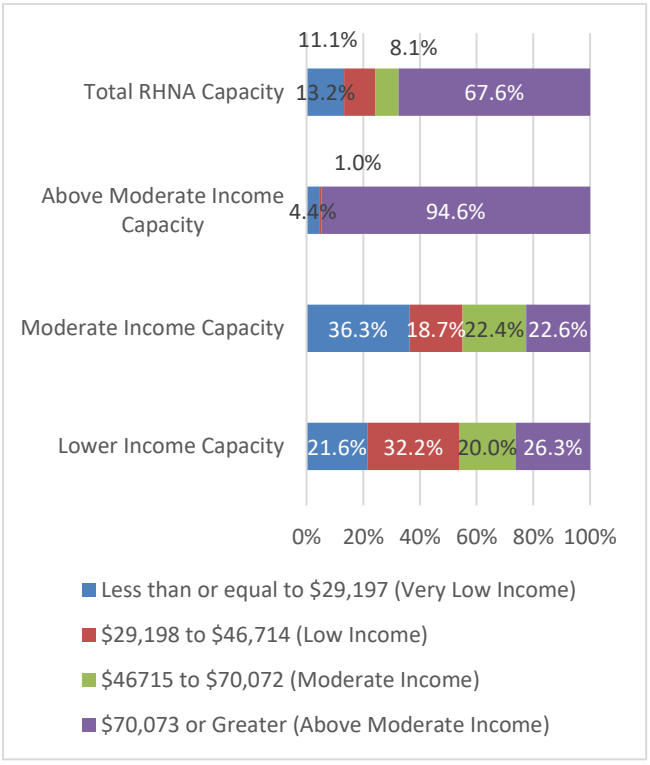


Source: City of Stockton and TCAC 2022

INCOME

As shown in **Figure HE-25, Percent Unit Capacity by Median Income**, the City has identified capacity for 13.2 percent of the units in the Sites Inventory in areas that have very low median incomes below $29,147 based on the 2020 San Joaquin County median income, and 11.1 percent in tracts with low median-income households (between $29,198 and $46,714) corresponding to higher rates of overcrowding and overpayment. In contrast, 67.6 percent of unit capacity is identified in Stockton's highest-income block groups around the west, north and eastern perimeter of the city, in the vicinity of University of the Pacific in Midtown, and block groups in the Upper Hammer Lane/Thornton Rd. neighborhood. An additional 8.1 percent of the city's unit capacity is identified within moderate-income areas (see **Figure 3-8, Local Median Income**). While approximately 53.9 percent of the lower-income capacity has been identified on sites with very low or low median incomes, these sites aim to reduce displacement risk for residents in these areas that currently may face a shortage of affordable options. Approximately 5.4 percent of the above moderate-income, and 55.0 percent of moderate-income unit capacity are also identified in lower-income neighborhoods. The distribution of these sites accommodating higher-income units will help facilitate mixed-income communities without concentrating lower-income units in lower-income areas.

Figure HE-25: Percent Unit Capacity by Median Income



Source: City of Stockton and ACS 2015-2019

Block groups that correlate to moderate-incomes are primarily found in clusters throughout the central portions of the city. To help reduce income segregation spurred by the siting of a greater proportion of affordable multifamily developments between West Lane and Pacific Avenue, and along West Lane, 20.0 percent of lower-income unit capacity and 22.4 percent of moderate-income unit capacity have been identified for sites within moderate-income areas of the city; 22.6 percent of moderate and 26.3 percent of lower-income unit capacity is identified in higher income neighborhoods. These increased housing mobility opportunities may alleviate pressure on the existing lower-income housing stock in the central Pacific Avenue/Lincoln Village, Upper Hammer Lane/Thornton

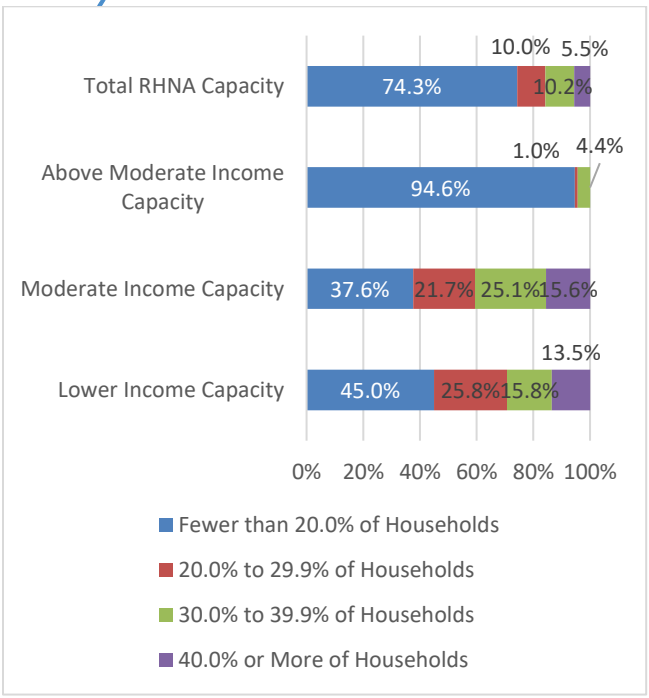
Rd., Morada/Holman, northern Midtown and portions of Eight Mile/Bear Creek neighborhoods that has resulted in renter overpayment and increasing home ownership prices, serves as a mechanism for achieving income integration and increased access to higher resource opportunities, and fosters de-concentration of lower-income households in the Downtown and southern portions of the city, as well as the two identified R/ECAPS in the central portion of the city.

Almost all of the above moderate-income unit capacity is associated with sites in the higher-income sections of the city, predominantly in newly developing neighborhoods in the Trinity/Northwest and Eight Mile/Bear Creek neighborhoods, providing housing mobility opportunities for existing and future residents.

In Stockton, 13.7 percent of households make less than 30.0 percent of area median income, which is considered extremely low-income. Conversely, rates of poverty are below 10.0 percent in the eastern, northern and western portions of the city as well as a cluster of centrally located neighborhoods east of I-5 in the Pacific Avenue/Lincoln Village neighborhood. Low rates of poverty in these localities may indicate that high costs of housing are a barrier to access for lower-income households seeking housing, forcing these households to seek housing in more affordable areas. Higher rates are found in the central and southern neighborhoods that coincide with the city's lower-income block groups and HUD identified R/ECAPS (Figure HE-3, Local Poverty Rates and Figure HE-5, R/ECAPS in Stockton), where housing typology and the presence of distribution, shipping and industrial uses likely accounts for more housing affordability and higher rates of poverty in these areas. These areas have historically been used as ship and rail yard worker housing, include the historical Chinatown community, and several tracts were redlined areas, with patterns of low incomes persisting in these areas.

As shown by **Figure HE-26, Percent Unit Capacity by Poverty Rate**, 74.3 percent of the total unit capacity has been identified on sites where rates of poverty are below 20.0 percent, and 10.0 percent of unit capacity is identified in neighborhoods with a poverty rate between 20.0 and 29.9 percent of households. A small portion of the unit capacity, 10.2 percent, falls in residential neighborhoods within 30.0 to 39.9 percent poverty rate tracts, and the remaining 5.5 percent are identified in the tracts with the highest poverty rate correlating to the TCAC/HCD Areas of High Segregation and Poverty and R/ECAPS with rates of poverty over 40.0 percent.

Figure HE-26, Percent Unit Capacity by Poverty Rate



Source: City of Stockton and ACS 2015-2019

The inclusion of 4.4 percent of above moderate-income and 40.6 percent of moderate-income unit capacity in the two highest poverty rate block groups encompassed within and in-between the Areas of High Segregation helps integrate higher-income households into these areas where a concentration of lower-income households and populations of color currently exists. This will promote income integration in these communities where many existing affordable multifamily complexes have contributed to the concentration of lower-income households. The inclusion of 29.3 percent of lower-income unit capacity within these high poverty rate neighborhoods will help reduce displacement risk for lower-income households residing in these neighborhoods, with access to commercial, services and amenities in the Downtown, whereas sites for lower-income households within the two lowest poverty rate portions of the city (70.7 percent) facilitate housing mobility opportunities for lower-income households and contribute to the reduction of

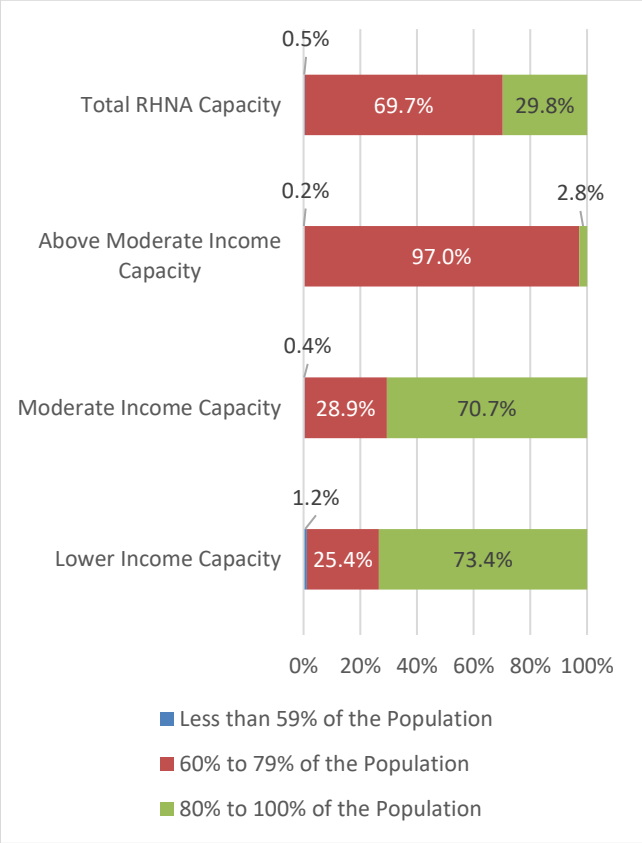
concentration of affordable housing and correlation of these resources with high poverty rates.

RACE AND ETHNICITY

As discussed previously, Stockton is one of the more diverse cities in San Joaquin County, with non-White residents comprising 80.6 percent of the city's population. White residents comprise majorities in the Brookside/Country Club and Trinity/Northwest neighborhoods west of I-5, and census tracts within Eight Mile/Bear Creek, western Upper Hammer Lane/Thornton Rd., western Pacific Avenue/Lincoln Village and tracts including University of the Pacific in the midtown neighborhood; many of which include planned golf course and lakeside communities which generally correspond with low poverty rates and moderate to higher-income households. The city's lowest income and heavily non-White communities are found in the northeast and eastern sections of the city (**Figure HE-4, Local Racial Demographics),** along March Lane, and neighborhoods south of, and including, Downtown, many of which tend to be found closer to non-residential uses. While neighborhoods in the southern portion of the city tend to be predominantly Hispanic or Latinx, neighborhoods in the northeastern sections of the city are predominantly Asian communities, and those in the central portion of the city along March Lane between West Lane and Pacific Avenue tend to be a heavily non-White diverse mix of race and ethnicity.

Additional lower- and moderate-income units in the city will improve access to housing in the city for residents who would otherwise be priced out of the housing market or experience a cost-burden and overcrowding conditions that has historically included communities of color.

Figure HE-27: Percent Unit Capacity by Non-White Population



Source: City of Stockton and ACS 2015-2019

As shown in **Figure HE-27, Percent Unit Capacity by Non-White Population**, 69.7 percent of the unit capacity is within tracts with a non-White population between 60.0 and 79.9 percent, primarily in the northwestern and northeastern corners of the city, and one tract in Midtown. An additional 29.8 percent of unit capacity falls in areas with a non-White population at or above 80.0 percent, primarily in the Port and Mount Diablo Waterfront, and southern and eastern portions of the city. The remaining sites are identified within the 0.5 percent of the city with a non-White population below 59.9 percent in the Brookside neighborhood.

DISABILITY

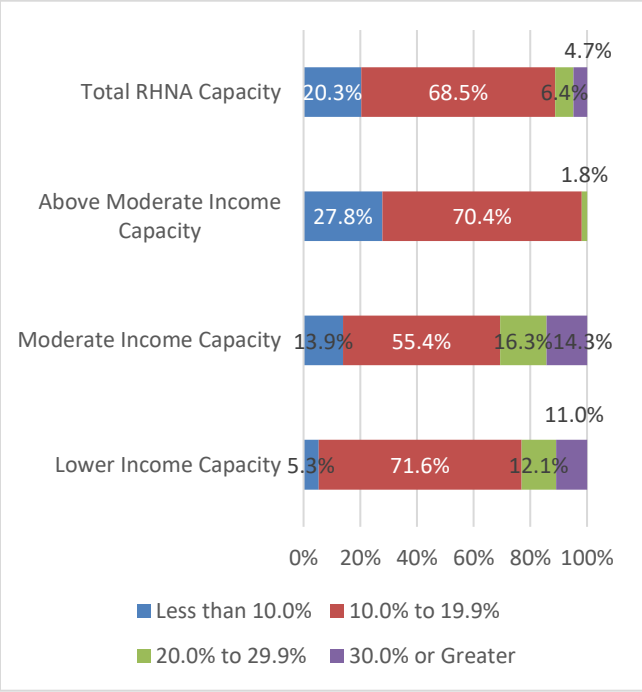
As shown on Figure HE-9, Percentage of the Population With a Disability, approximately 13.6 percent of Stockton's population lives with one or more types of disabilities, with rates reaching between 25.4 to 31.1 percent in the Downtown correlating to a concentration of affordable housing complexes and the TCAC/HCD High Segregation and Poverty designation as well as

R/ECAP status; and between 20.0 to 30.0 percent in scattered tracts in the Midtown, Pacific Avenue/Lincoln Village, and Weston/Van Buskirk neighborhoods. ACS data indicates that a higher proportion of residents who are living with a disability are residing in lower-income areas correlating with the location of affordable housing stock; in older neighborhoods where residents may be aging in place; or in proximity to major medical facilities, as is the case in residential areas adjacent to University of the Pacific in Midtown where the Stockton Regional Rehabilitation Hospital, St. Josephs Medical Center, and other medical facilities are concentrated, as well as two large deed restricted multifamily complexes.

As shown on **Figure HE-28, Percent Unit Capacity by Disability Rate**, the City has identified a capacity for 20.3 percent of potential units to meet the RHNA in census tracts with less than 10.0 percent disability rate, primarily in the Brookside/Country Club, Trinity/Northwest and Mount Diablo/Waterfront neighborhoods, with 27.8 percent of above moderate-income, 13.9 percent of moderate-income, and 5.3 percent of lower-income unit capacity identified in these tracts which generally correspond to moderate to higher median incomes and lower poverty rates. This distribution will improve accessibility for individuals with disabilities at all income levels within new housing opportunities that are required to comply with current development standards and Americans Disabilities Act (ADA) standards.

Approximately68.5 percent of the unit capacity is identified on sites within tracts with 10.0 to 19.9 percent of the population experiencing disabilities, which are generally north of the Calabasas River, in the East Stockton, the Port and Mount Diablo Waterfront, Industrial Annex, and the more southerly sections of Weston Ranch/Van Buskirk and South Stockton neighborhoods. Lower-income unit capacity (71.6 percent) in tracts with higher rates of disabilities between 10.0 and 19.9 percent provides housing mobility opportunities for current lower-income residents with disabilities to move to housing that is ADA compliant. Sites in the southern portion of Pacific Avenue/Lincoln Village neighborhood off Pacific Avenue just north of University of the Pacific, as well as the sites in the Midtown neighborhood east of the San Joaquin Catholic Cemetery are accessible to major medical facilities. Sites in the Morada Holman neighborhood in the vicinity of the intersection of West and March Lanes will help to improve access for, and accommodate the needs of persons living with disabilities, benefit from close access to services and amenities as well as proximity to transit along major commercial corridors.

Figure HE-28: Percent Unit Capacity by Disability Rate



Source: City of Stockton and ACS 2015-2019

A large proportion of moderate-income unit capacity (55.4 percent), as well as 70.4 percent of the above-moderate unit capacity in these tracts described above, provide mobility opportunities for moderate and higher-income persons with disabilities in new structures which are ADA compliant and built to universal design, as well as fostering mixed-income communities where sited in the vicinity of, or adjacent to, lower-income sites along major transportation corridors near commercial activity nodes and/or educational facilities.

A smaller share of lower-income unit capacity (12.1 percent) is identified on sites with disability rates between 20.0 and 30.0 percent of the population, primarily within and around the Downtown, in tracts adjacent to University of the Pacific in Midtown, in South Stockton near the junction of I-5 with the French Camp Turnpike, and on one small site in Weston Ranch/Van Buskirk.

There are few above moderate-income sites (1.8 percent), and 16.3 percent of moderate-income unit capacity in sites with the higher disability rate.

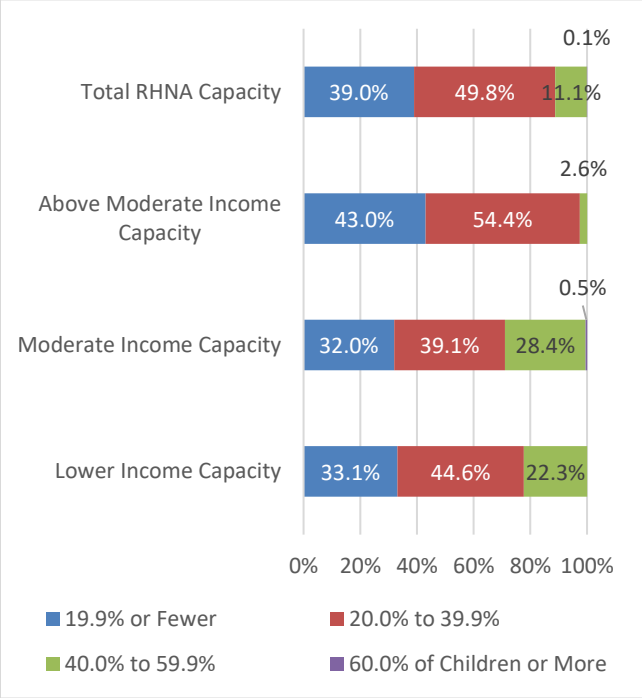
The remainder of the lower- and moderate-income unit capacity (11.0 and 14.3 percent respectively) is identified within the Downtown, increasing the opportunities for disabled persons currently experiencing overpayment, homelessness or overcrowding, as well as those living in units without accessibility features, to acquire affordable, and adequately accessible housing.

FAMILIAL STATUS

As previously discussed, some areas of Stockton have a higher rate of female-headed households with children and no spouse or partner present, and senior households living alone. Female-headed households with children and no spouse or partner (8.1 percent of households) often face particular challenges to housing access and are at elevated risk of displacement. Approximately 28.9 percent of female-headed households with children have incomes below the poverty line.

Similar to other indicators of fair housing, 39.0 percent of the unit capacity is identified on sites in Eight Mile/Bear Creek, Brookside/Country Club, tracts within Upper Hammer Lane/ Thornton Road neighborhood, the majority of Morada/Holman neighborhood east of West Lane, the University of the Pacific area in Midtown, the Port and Mount Diablo Waterfront, and Industrial Annex neighborhoods in which up to 19.9 percent of children are in female-headed households (**Figure HE-29, Percent Unit Capacity by Percent of Children in Female-Headed Households**). Approximately 43.0 percent of higher-income unit capacity, 32.0 percent of moderate-income unit capacity, and 33.1 percent of lower-income unit capacity is identified in these tracts, increasing the opportunities for female-headed households currently experiencing overpayment and/or overcrowding to acquire affordable, and adequately sized housing in generally higher-income neighborhoods while promoting a reduction in the concentration of female headed households in other parts of the city.

Figure HE-29: Percent Unit Capacity by Percent of Children in Female-Headed Households



Source: City of Stockton and ACS 2015-2019

54.4 percent of above moderate-income unit capacity, 39.1 percent of moderate-income unit capacity, and 44.6 percent of lower-income unit capacity is identified in tracts with 20.0 to 39.9 percent of children living in female-headed households, generally encompassing the central portions of the city between I-5 and the San Joaquin Sacramento Subdivision Rail Line north of the Calaveras River, East Stockton and the southern portion of the Weston Ranch/Van Buskirk neighborhood. Eight of these tracts are identified by HUD as R/ECAPS, and the majority are designated Areas of High Segregation and Poverty. Identification of lower-income sites increases the opportunities for female-headed households experiencing overpayment and/or overcrowding to acquire affordable, and adequately sized housing while promoting a reduction in the concentration of female headed households in parts of the city with higher rates of children in female-headed households.

While a large proportion of unit capacity is identified in sites corresponding to this high proportion of children in single female-headed households, the majority of the site capacity for above moderate-income units is

identified in the Trinity/Northwest Stockton neighborhood which currently is primarily vacant land with little existing residential development and a large commercial center, designated as high and highest resource. The identification of 8.7 percent of moderate- and 79.2 percent of above moderate-income unit capacity in these areas increases mobility opportunities for moderate and higher-income single female-headed households from within and outside of the city to find appropriate units, while decreasing competition for housing within other neighborhoods in the city.

The remaining 22.3 percent of lower-income unit capacity and 2.6 percent of above-moderate unit capacity, along with 28.4 percent of moderate-income unit capacity is located within tracts in which 40.0 to 59.9 percent of children reside in single female headed-households. These tracts are located in Downtown, South Stockton and Pacific Avenue/Lincoln Village neighborhoods, and one tract in Upper Hammer Lane/Thornton Road neighborhood. Of the seven tracts falling within this high rate of children in single female-headed households, four are R/ECAPs and three designated Area of High Segregation and Poverty, while two are adjacent to San Joaquin Delta College and the concentration of commercial and services located in the vicinity. Sites identified in these areas provide housing mobility for lower- and moderate-income female headed households, and the moderate-income unit capacity facilitates income integration in the areas with high rates of poverty.

By adding moderate and above-moderate units throughout the city, and particularly by locating lower-income units within higher income areas to provide access to existing and new amenities and resources, Stockton will become more accessible to female-headed households with children and no spouse or partner present, as well as other single-parent households.

POTENTIAL EFFECT ON ACCESS TO OPPORTUNITY

MOBILITY

As previously discussed, 50.1 percent of households in Stockton are renters. The rental vacancy rate is 4.9 percent, while the ownership unit vacancy rate is 0.9 percent. The very low ownership unit vacancy rate indicates a shortage of for-sale homes available in Stockton. Although the proportion of owner households (49.9 percent) and renter households (50.1 percent) is fairly comparable based on a citywide average, the distribution of households by tenure varies widely within the different neighborhoods throughout the city. There are 15 census tracts in the city where renters comprise over 60.0 percent of households. Seven of these tracts in which over 60.0 percent of households are renters are located primarily in the greater Downtown, South and East Stockton, the West Lane commercial corridor in the Upper Hammer/Thornton Road and Morada/Holman neighborhoods, and the eastern portion of the Pacific Avenue/Lincoln Village neighborhood. According to 2016-2020 ACS data, Black and Hispanic households have higher rates of renter-occupancy than Asian and White non-Hispanic households. Within the majority of these census tracts, between 5.0 to 15.0 percent of the renters utilize Housing Choice Vouchers (HCV). There are an additional two tracts, both R/ECAPS and High Segregation and Poverty designations in the Upper Hammer Lane/Thornton Road and Pacific Avenue/ Lincoln Village neighborhoods in the vicinity of the West Lane commercial corridor where the HCV utilization rate exceeds 20.0 percent of renter households.

Approximately 79.2 percent of the total above-moderate-income unit capacity is identified in the Trinity/Northwest Stockton neighborhood which has a current rental rate of 70.8 percent, yet a low rate of HCV usage, providing housing mobility opportunities for higher income renter households. To supply additional housing mobility opportunities for lower-income renter households that do not currently hold HCVs in areas with rates of renter occupancy above 60.0 percent, lower income unit capacity is identified in Downtown

(10.8 percent), South Stockton (23.8 percent), East Stockton (4.4 percent), Pacific Avenue/Lincoln Village (3.4 percent), Morada/Holman (11.5 percent), and Upper Hammer Lane/Thornton Road (3.0 percent) neighborhoods, as well as in areas in Midtown, Weston Ranch/Van Buskirk, and Industrial Annex neighborhoods for additional housing mobility opportunities which may reduce high concentrations of renters in other parts of the city.

Moderate-income and above moderate-income unit capacity identified in these high renter occupancy tracts fosters income-integration, particularly in the tracts with highest representation of renter households in Downtown, South and East Stockton and Morada/Holman neighborhoods, and will increase housing mobility opportunities primarily for moderate-income households.

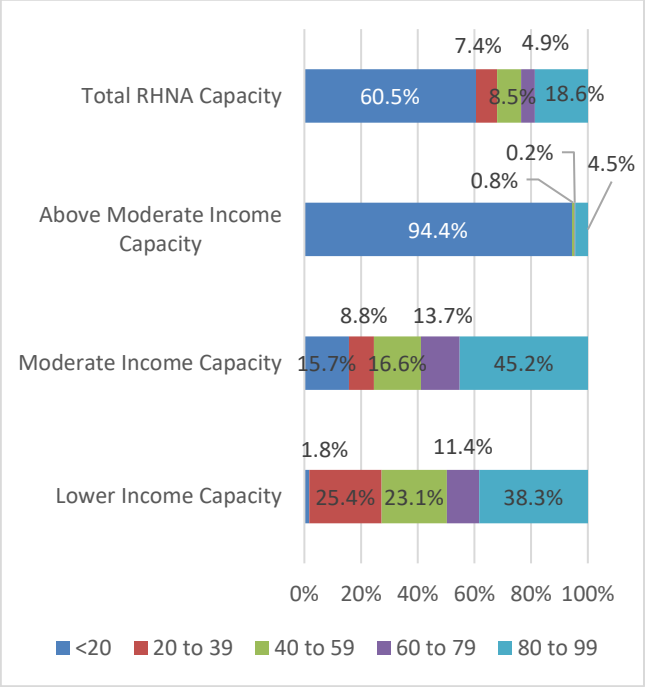
Sites to meet the lower-income RHNA are also identified throughout the city in areas where they will provide housing mobility opportunities in higher income neighborhoods which also helps reduce existing concentrations of lower-income households and populations of color; as well as within lower-income sections of the city, including R/ECAPs and Areas of High Segregation and Poverty, to provide housing mobility opportunities that deter potential displacement of existing residents at risk of losing their housing and assist in reducing high renter overpayment rates with or without HCV assistance. Many of the lower-income units are co-located in proximity to moderate-income unit capacity to facilitate income integrated neighborhoods and support the development of improved resource and economic mobility opportunities, which affirmatively furthers fair housing.

EMPLOYMENT OPPORTUNITIES

As discussed in this assessment, 34.4 percent of residents are employed within the city. Central Stockton and portions of Midtown have the closest proximity to jobs; however, previous analysis suggests that while there are many job opportunities in these tracts, the resident population in these neighborhoods is not filling them. Scores in the northern portion of the city indicate furthest proximity to jobs, although these same areas reflect the highest market participation index scores and most positive anticipated educational and economic outcomes, and therefore it is likely a portion of residents in these neighborhoods have the greatest commuting accessibility to employment opportunities outside of the city and the San Francisco Bay Area. The combination of employment factors in Stockton indicates that the jobs in the city may not meet the needs of residents, based on those commuting out of the city, market engagement, and the jobs-household ratio.

As shown in **Figure HE-30, Percent Unit Capacity by Jobs Proximity Index Score**, the City has identified the greatest capacity (67.9 percent of the unit capacity) for lower-, moderate-, and above moderate-income units (27.2, 24.5 and 94.4 percent of their total capacities, respectively) in areas which have a score below the 40th percentile relating to limited proximity to jobs within the city, which generally includes the portion of the city west of I-5 north of Benjamin Holt Drive; and east of I-5, north of Benjamin Holt Drive to Alexandria Place, north of West Lincoln Road between Alexandria Place and Pacific Avenue, and north of West Hammer Road between Pacific Avenue to the San Joaquin Valley Railroad Sacramento Subdivision line. Although a large portion of the total unit capacity falls within the lower percentile range, the majority of this unit capacity is within above moderate- and moderate-income sites with the highest labor force engagement rates.

Figure HE-30: Percent Unit Capacity by Jobs Proximity Index Score



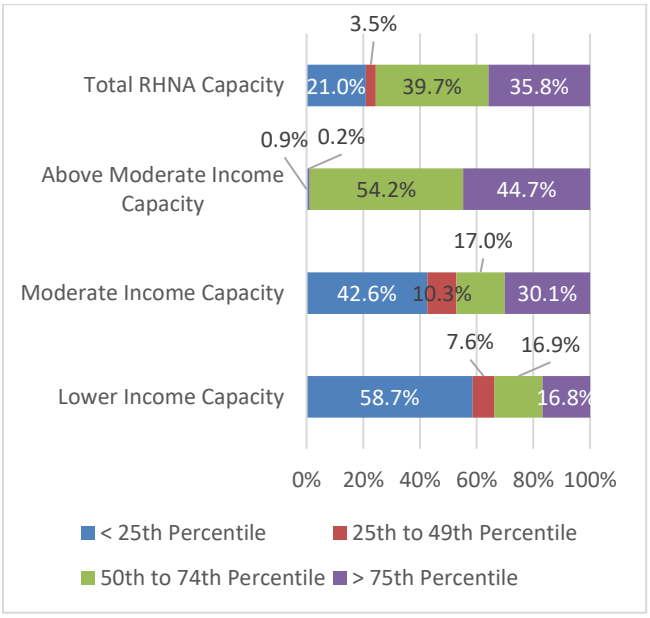
Source: City of Stockton and HUD 2014-2017

Almost 25.0 percent of the unit capacity in the sites inventory is met in tracts with jobs proximity scores above the 60th percentile, generally encompassing the Pacific Avenue/Lincoln Village, Brookside/Country Club, Midtown, Downtown, East Stockton, and Port and Mount Diablo Waterfront neighborhoods, as well as portions of South Stockton. The high proportion of lower-income (49.7 percent) and moderate-income (58.9 percent) unit capacity in the tracts with the highest jobs proximity index supports direct access to professional, government, service and commercial, industrial, airport related, and shipping and distribution employment opportunities, as well as access to employment opportunities in adjacent French Camp, Tracy and Modesto to the south, Lodi and Sacramento to the north via I-5, and Contra Costa County and the Bay Area to the west. This may help lower- and moderate-income households to limit their combined housing and transportation costs associated with traveling to work. This distribution also provides higher-income residents and residents currently commuting out of town for their jobs access to higher income housing units to support employment opportunities in the city that were not available previously.

EDUCATIONAL OPPORTUNITIES

According to the DOE, most Stockton schools are below the state educational standards for ELA and mathematics at each grade level, with performance generally correlating to income. Anticipated educational outcomes, (**Figure HE-14, Local TCAC/HCD Educational Outcome Percentile Scores**), are lowest in the southern portion of the city and in central Stockton between West Lane and Pacific Avenue correlating to concentrations of deed restricted multifamily housing stock; and are higher along the western, northern and northeastern perimeter of the city, correlating to TCAC/HCD Resource designations.

Figure HE-31: TCAC/HCD Educational Domain Scores



Source: City of Stockton and TCAC/HCD 2021

As shown in **Figure HE-31, TCAC/HCD Educational Domain Scores**, the existing patterns of access to opportunity related to educational resources indicate that 24.5 percent of the city's RHNA capacity falls within the least positive educational outcome percentiles below the 50th percentile, 39.7 percent falls between the 50th and 75th percentile, and 35.8 percent in the highest percentile, correlating to median income and TCAC/HCD higher resource designations.

While 66.3 percent of the lower-income unit capacity is identified on sites with less positive educational outcomes, the identification of 52.9 percent of

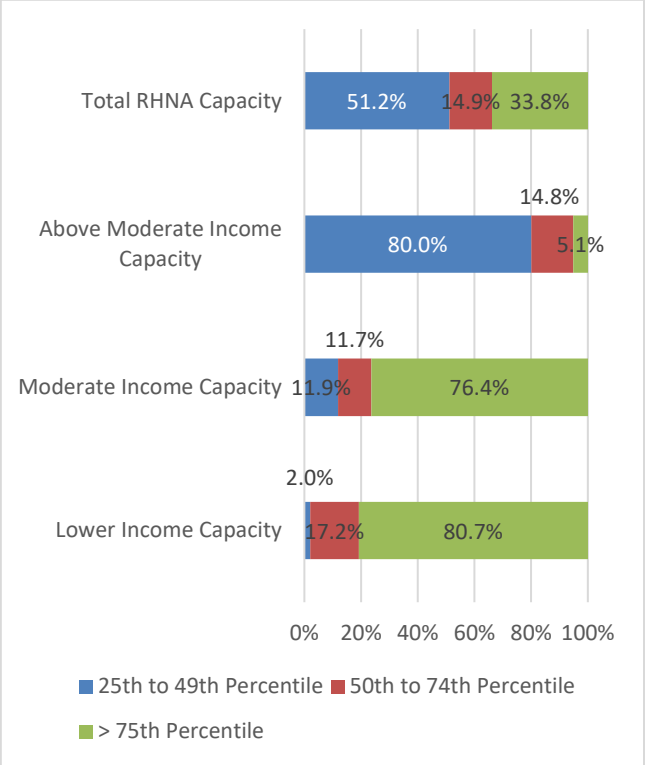
moderate-income unit capacity within these neighborhoods promotes the development of higher-income housing units in lower performing neighborhoods. Integration of income levels increases potential for increased educational domain scores and resource designations. The identification of 33.7 percent of lower-income unit capacity in higher scoring areas promotes housing mobility with access to educational opportunities with higher attainment scores generally associated with higher income, higher resource areas. Identification of 47.1 percent of moderate and 98.9 percent of above moderate-income unit capacity in tracts with scores above the 50th percentile will provide housing mobility opportunities with more positive anticipated educational outcomes. RHNA capacity has been identified in areas that facilitate housing mobility opportunities for lower-income households, and also so that all schools can benefit from increased diversity and income-integration to raise educational outcomes.

Over half of the total RHNA inventory unit capacity, 60.3 percent, are located within the Lodi Unified School District catchment area, including 92.2 percent of the above moderate-income unit capacity, 15.9 percent of moderate income unit capacity, and 2.0 percent of lower income unit capacity. An additional 31.4 percent of units are located within the Stockton Unified School District, including 7.7 percent of above moderate-income unit capacity, 77.4 percent of moderate-income unit capacity, and 66.7 percent of lower-income unit capacity. A significant percentage of lower-income unit capacity, 26.9 percent, is also located within the Manteca Unified School District, as is 5.3 percent of moderate income unit capacity. The remaining 1.3 percent of unit capacity is located within the Lincoln Unified School District catchment area, including 4.4 percent of lower-income unit capacity, 1.4 percent of moderate-income unit capacity, and 0.1 percent of above moderate income unit capacity.

ENVIRONMENTAL HEALTH

As shown in **Figure HE-15, CalEnviroScreen Percentiles**, most of the city north of the Calaveras River, with the exception of two census tracts scores below the 75th percentile; while south of the Calaveras River the majority of tracts score above the 75th percentile, with the exception of the tract encompassing University of the Pacific and the adjacent tract to the west. Tracts with scores above the 75th percentile qualify as a disadvantaged community, impacting access to opportunity as it relates to healthy living conditions. Aside from environmental pollution factors including exposure to particulate matter and ozone from industrial, shipping and railroad yard operations, a concentration of other factors, including lower incomes, poverty rates between 10.0 to 20.0 percent of the households, concentrations of single female-headed households with children, high rates of non-White populations, low rates of educational attainment, and a high rate of unemployment as well as older homes conditions and lead in housing may contribute to the least positive environmental scores. While these factors may not reflect all neighborhoods in this percentile range, they do represent an area of potential concern regarding fair housing and disproportionate exposure to environmental hazards and a concentration of vulnerable populations, which is mitigated by Programs 6, 12, 14, 15, 17, 26, 27, and 30.

Figure HE-32: Percent of Unit Capacity by CalEnviroScreen Scores



Source: City of Stockton and California OEHHA 2021

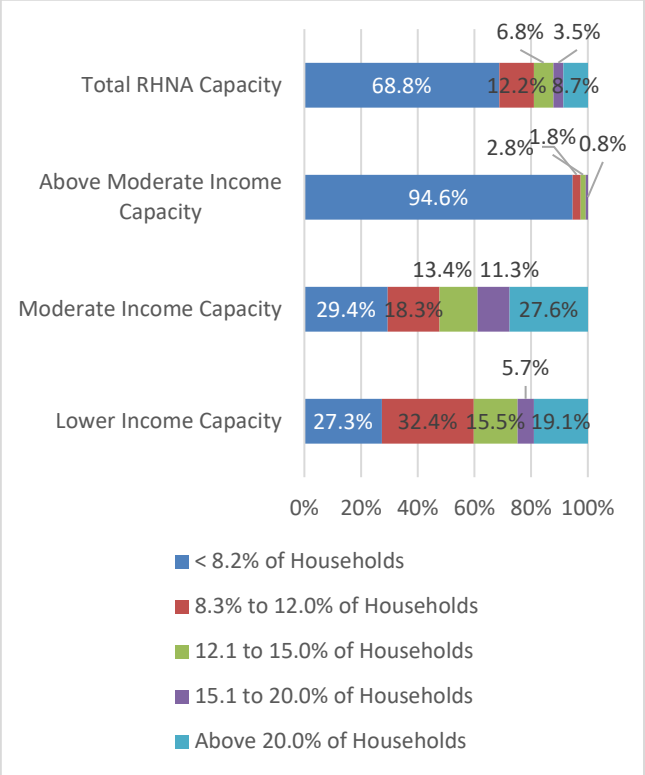
As shown in Figure HE-32, Percent of Unit Capacity by CalEnviroScreen Scores, approximately 51.2 percent of the RHNA capacity is identified in the tracts scoring below the 50th percentile. Approximately 11.9 percent of moderate-income unit capacity, and 2.0 percent of lower-income unit capacity is identified in the tracts with the lowest scores; while 80.0 percent of above moderate-income capacity is identified in the tracts with the lowest scores in the Trinity/Northwest Stockton and Eight Mile/Bear Creek neighborhood, which scores in the 50th to 74th percentile, most likely associated with adjacency to agricultural activities. The majority of lower-income (80.7 percent) and moderate-income (76.4 percent) unit capacity is identified in areas that are considered disadvantaged communities, the moderate-income unit capacity will contribute to income integrated neighborhoods and reduction in the concentration of lower-income households with associated indicators of disadvantaged communities in these tracts, while the lower-income unit capacity provides housing mobility opportunities for households within their existing neighborhoods to reduce displacement potential and homelessness. As well, although relatively small, the proportion of lower-and moderate-income unit capacity in non-disadvantaged neighborhoods of the city contributes to reduction of concentrations of lower-income households in the most environmentally impacted areas of the city.

Potential Effect on Displacement Risk

Overcrowding

Overall, 9.3 percent of households in Stockton are considered overcrowded. Overcrowding is seen more amongst those that are renting, whereas 12.4 percent of renters are overcrowded, 6.0 percent of homeowners experience overcrowding. Overall, households experiencing overcrowding in Stockton, when combined with income or accessibility challenges, may become at risk for displacement. Higher overcrowding rates are concentrated along the West Lane commercial corridor, Downtown, in the South and East Stockton neighborhoods, and Industrial Annex neighborhood, generally correlating to the city's lowest-income neighborhoods, R/ECAPs and TCAC/HCD Areas of High Segregation and Poverty. These are areas where older housing stock, originally constructed to serve the shipping industry, is mixed with industrial and other nonresidential uses, as well as the location of deed restricted housing stock, particularly in the Downtown and West Lane commercial corridor.

Figure HE-33: Percent Unit Capacity by Rate of Overcrowded Households



Source: City of Stockton and California HHS; Esri 2022

As shown in **Figure HE-33, Percent Unit Capacity by Rate of Overcrowded Households**, the city has identified 68.8 percent of unit capacity in tracts with the lowest rates of overcrowding, and 12.2 percent in tracts with rates between 8.3 and 11.9 percent of households experiencing overcrowding. An estimated 27.3 percent of the lower-income unit capacity, 29.4 percent of the moderate-income unit capacity, and 94.6 percent of the above moderate-income unit capacity is identified in tracts with rates of overcrowding below 8.2 percent, (the statewide average) providing housing mobility opportunities for households of all incomes experiencing overcrowding in other areas of the city. While 12.2 percent of the RHNA capacity is identified in tracts with overcrowding rates between 8.3 and 12.0 percent, 27.3 percent of the low-income RHNA unit capacity and 29.4 percent of moderate-income unit capacity is identified in the tracts south of March Lane between I-5 and Pacific Avenue, in the Stonewood Estates RCAA, within eastern Midtown, the Port and Mount Diablo Waterfront neighborhood, the northern tract in the Weston Ranch/Van Buskirk neighborhood, and one tract in South Stockton which is primarily industrial and rail yard uses, providing housing mobility opportunities for residents in units which may be both affordable and of adequate size to meet the needs of lower- and moderate-income households while facilitating potential to reduce concentrations of overcrowding in other parts of the city.

Approximately 12.2 percent of the unit capacity is located in tracts with overcrowding above 15.1 percent of households. 24.8 percent of lower-income unit capacity and 38.9 percent of moderate-income unit capacity is identified on sites in these areas of higher overcrowding which generally correspond to R/ECAPs and TCAC/HCD designations of Area of High Segregation and Poverty, as well as a concentration of deed restricted housing stock. One pipeline project includes 0.8 percent of the above moderate-income unit capacity in this area, initiating income integration into the South Stockton neighborhood. which helps relieve pressure on the existing inventory of housing units in that area to meet needs of residents experiencing overcrowding while remaining in their own familiar neighborhood. Overall, the unit potential identified in the sites inventory will help to facilitate additional housing mobility opportunities for a range of sizes and locations for those households that are currently experiencing overcrowding.

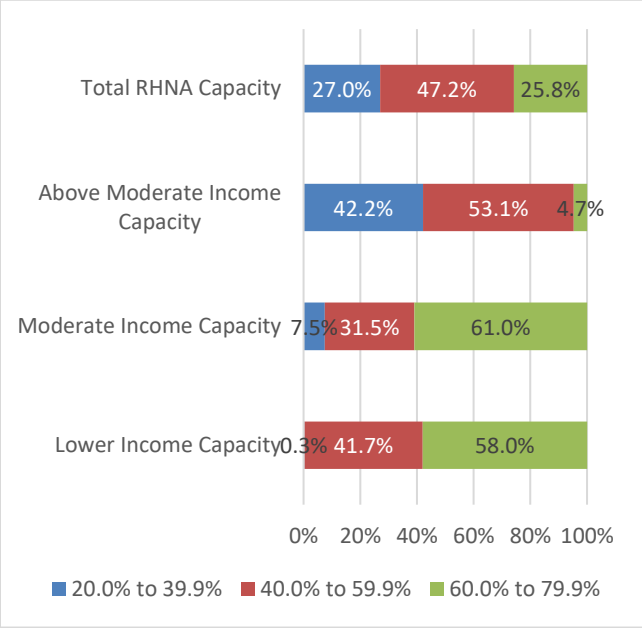
OVERPAYMENT

In Stockton, 20.8 percent of the households are cost burdened and 21.0 percent are severely cost burdened, for a total of 41.8 percent of the households experiencing some level of overpayment. Approximately 27.9 percent of all homeowners are overpaying for housing; in contrast, 54.4 percent of all renters are cost burdened, and, in most circumstances, overpayment is closely tied to income, and in many cases, but not consistently, proportion of populations of color, with lower-income renters experiencing the highest incidence of overpayment and most at risk of displacement. Additionally, previous analysis has identified that special-needs populations, including female-headed households, large families, persons with disabilities and seniors, often fall into the lower-income category and may be particularly at risk of displacement when housing opportunities at affordable costs, sizes, or access to resources are not available.

According to the 2015-2019 ACS, most of the city reflects renter cost burdened rates between 40.0 to 59.9 percent (**Figure 18, Renter Overpayment in Stockton**). The areas with rates at 60.0 percent or above are found in neighborhoods along the West Lane commercial corridor, along March Lane and two tracts in the Pacific Avenue/Lincoln Village neighborhood, in the greater Downtown area, and tracts within South and East Stockton neighborhoods.

As shown in **Figure HE-34, Percent Unit Capacity by Renter Overpayment**, and **Figure HE-35, Unit Capacity by Homeowner Overpayment**, 25.8 percent of the city's RHNA capacity is identified in tracts with a renter overpayment rate over 60.0 percent; 47.2 percent of the RHNA capacity is in tracts with has renter overpayment rates between 40.0 to 59.9 percent. The remaining 27.0 percent includes rates of renter overpayment between 20.0 to 39.0 percent. The majority of lower-income RHNA units (58.0 percent) have been identified on sites in areas in which approximately 60.0 percent and above of renters are overpaying for housing. The majority of the remaining lower-income unit capacity (41.7 percent) is identified on sites where between 40.0 and 59.9 percent of renters overpay for housing, , primarily in the central portion of the city north of the Calaveras River, in the Midtown, Upper Hammer Lane/Thornton Road, and Weston Ranch/Van Buskirk neighborhoods. Additional affordable rental resources in these areas will facilitate housing mobility opportunities for renters currently overpaying and at risk of displacement, whereas the identification of sites to accommodate the lower-income units in locales with lower overpayment rates contributes toward reducing concentrations of renter overpayment in areas of more concentrated overpayment by providing housing mobility opportunities, and fostering income-integration into neighborhoods that have more positive economic conditions. An additional 0.3 percent of lower-income units were identified in areas where between 20.0 to 39.9 percent of renters overpay for housing.

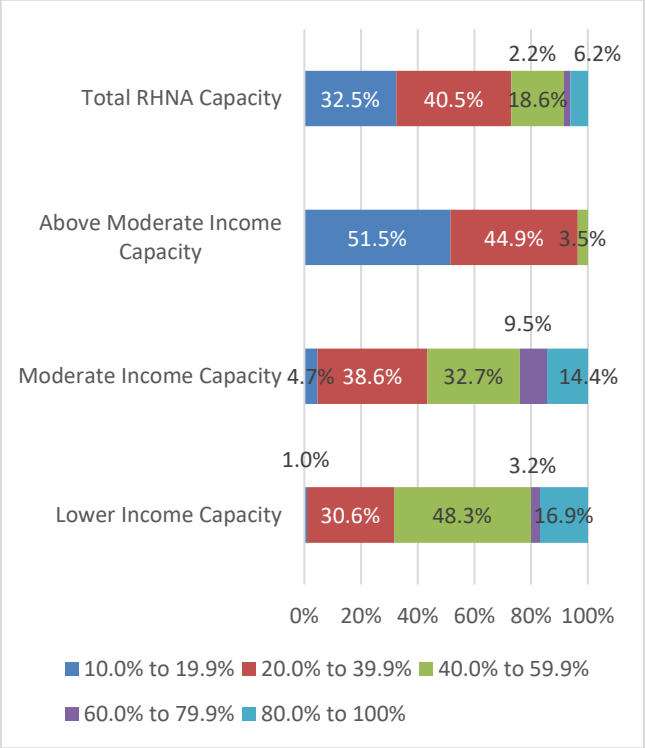
Figure HE-34: Percent Unit Capacity by Renter Overpayment



Source: City of Stockton and ACS 2015-2019

As well, 61.0 percent of moderate-income unit capacity and 4.7 percent of above moderate-income projects are within the tracts with the highest rates of renter overpayment, which promotes income-integrated neighborhoods and reduces the concentration of severely cost burdened households overpaying for housing. Overall, an increase in the supply of lower- and moderate-income housing throughout the city, particularly those in proximity to commercial uses and services, will help to alleviate conditions that contribute to overpayment by reducing the gap between supply and demand for this type of housing.

Figure HE-35: Percent of Unit Capacity by Homeowner Overpayment



Source: City of Stockton and ACS 2015-2019

While homeowners generally experience cost burden at a lesser rate than renters, in Stockton the range of rates of overpayment is broader than that of renters, with some sites located in areas where only 12.3 percent of owners overpay for housing, and others located in tract 1.00 where all owner households experience cost burden. The highest rates of homeowner overpayment occur in the Downtown, portions of East and South Stockton, and southeast of Weberstown Mall, which are designated by TCAC/HCD as an Area of High Segregation and Poverty and most are R/ECAPS, where over 60.0 percent of homeowners are cost burdened (**Figure HE-19, Homeowner Overpayment in Stockton**). As shown on **Figure HE-35, Percent of Unit Capacity by Homeowner Overpayment**, 8.4 percent of the distribution of RHNA units is identified in these areas to increase ownership housing supply, with 20.1 percent of lower-income, and 24.0 percent of moderate-income unit capacity identified to potentially reduce displacement risk and overcrowding for these households as more units become available, and facilitating housing mobility opportunities throughout these areas near services and resources in commercial areas, easing pressure on the housing stock.

Conversely, 73.0 percent of site distribution is within sites in areas in which less than 39.0 percent of homeowners are cost burdened, including 96.5 percent of above moderate-income, 31.6 percent of lower-income, and 43.3 percent of moderate-income unit capacity; which includes the following neighborhoods: Trinity/Northwest Stockton, Eight Mile/Bear Creek, Upper Hammer Lane/Thornton Rd. west of Lower Sacramento Road, Brookside/Country Club, northern and eastern Morada/Holman, Pacific Ave/Lincoln Village, Midtown and portions of Weston Ranch/Van Buskirk.

Approximately 18.6 percent of the unit distribution is identified where 40.0 to 59.9 percent of homeowners overpay with 48.3 percent of lower-income unit capacity and 32.7 percent of moderate-income unit capacity identified on sites north of the Calaveras River along the West Lane, Pacific Avenue and March Lane commercial corridors within the Pacific Venue/Lincoln Village, Morada/Holman and southern portion of Upper Hammer Lane/Thornton Road neighborhoods. The identification of 3.5 percent of above moderate-income unit capacity in the South Stockton and Pacific Avenue/Lincoln Village neighborhoods with rates of overpayment above 40.0 percent but below 59.9 percent, predominantly within the Mobile Homes on El Dorado pipeline residential project in South Stockton will foster income integration in the southern portion of the city and provide alternatives to the typical single family detached housing unit.

The addition of these units will help to alleviate existing overpayment by offering lower- and moderate-income units to current and future residents where there is need and increasing the housing stock overall to alleviate the demand on an existing shortage of housing at affordable price points. Additionally, the site capacity and distribution of units by income category will facilitate mobility opportunities for all households.

CONTRIBUTING FACTORS

In discussions with stakeholders and fair housing advocates and through this assessment of fair housing issues, the City identified factors that contribute to fair housing issues, as shown in **Table HE-49.** While a variety of strategies are identified in this element to address the fair housing issues, the most pressing issues are listed below. The fair housing indicators analyzed earlier in this chapter that led to identification of the fair housing issues are shown in bold in parentheses after each issue. The sub-categories analyzed under each indicator are also listed after the bolded indicator.

- The concentrations of R/ECAPS and limited income-integration at the local neighborhood level, (**Integration and Segregation** – TCAC/HCD Opportunity, Income, Lower Income Neighborhoods and Poverty, Race/Ethnicity, R/ECAPs and RCAAs; **Other Relevant Factors** - History of Development Trends, Land Use and Zoning; **Sites Inventory Analysis** – Tract Analysis, Potential Effect on Integration and Segregation)
- Displacement risk due to rising housing costs, (**Integration and Segregation –** Income, Lower Income Neighborhoods and Poverty; **Access to Opportunity** – Housing Mobility, and Employment Opportunities; **Disproportionate Housing Need and Displacement Risk** – Overcrowding, Overpayment, Housing Condition, Displacement Risk; **Other Relevant Factors** – History of Development Trends; **Enforcement and Outreach Capacity** – Compliance with Fair Housing Laws, Fair Housing Complaints);
- Homelessness, (Chapter 2 – Housing Needs Assessment, **Disproportionate Housing Need and Displacement Risk** – Overcrowding, Overpayment, Housing Condition, Displacement Risk; Housing Mobility, **Enforcement and Outreach Capacity** – Compliance with Fair Housing Laws, Fair Housing Complaints)
- Disproportionate access to resources for lower-income, households with special needs, and populations of color, (**Integration and Segregation** – TCAC/HCD Opportunity, Income, Lower Income Neighborhoods and Poverty, Race/Ethnicity, Familial Status, Persons with Disability, **Access to Opportunity** – Transit Mobility, Housing Mobility, Education; Employment Opportunities); and
- Barriers to homeownership, (**Integration and Segregation** - Income, Lower Income Neighborhoods and Poverty, Race/Ethnicity; **Disproportionate Housing Need and Displacement Risk** – Overcrowding, Overpayment, Housing Condition; **Other Relevant Factors** - History of Development Trends, Land Use and Zoning; **Enforcement and Outreach Capacity** – Compliance with Fair Housing Laws, Fair Housing Complaints).

Prioritized contributing factors are bolded in **Table HE-49**, and associated actions to meaningfully and affirmatively further fair housing related to these factors are bold and italicized.

Table HE-49: Factors that Contribute to Fair Housing Issues
2023

AFH IDENTIFIED ISSUES	CONTRIBUTING FACTORS	MEANINGFUL ACTIONS
Presence of concentrated R/ECAPs in Greater Downtown, South Stockton, East Stockton, and between West Lane and Pacific Avenue in Northern Stockton	***Concentrations of poverty and lower-income households.*** *Shortage of affordable housing options in Moderate and High resource areas and higher-income unit capacity in lower-income and lower resource areas to foster income integration and stimulate place-based revitalization and improved access to resources.* *Concentration of renter-occupied households in Low resource areas.* ***Highest share of minority residents compared to county and megaregion.*** *High rate of HCV holders and lack of acceptance of HCVs in Moderate and High resource areas* ***Older housing stock and areas with poor housing conditions resulting in lower housing costs in South Stockton, Downtown and East Stockton, and scattered residential areas along major commercial corridors north of Midtown.*** *High rates of diversity concentrated in Greater Downtown, South Stockton and East Stockton due to historical practices*	*Maintain a list of vacant residential land appropriate for affordable housing in the city, including sites in moderate and high resource areas (Program 1).* *Encourage construction of Accessory Dwelling Units targeting areas of higher resource opportunity (Program 6).* *Encourage the construction of affordable units with three or more bedrooms and incentivize on-site childcare and support services in mixed use and multifamily developments (Program 30).* ***Produce affordable rental housing in opportunity-rich locations near transit, services, and key amenities (Programs 5,8,12).*** *Development Code revisions to address zoning to facilitate housing types serving lower-income households (Program 17).* *Implement multilingual communication and outreach strategies (Program 30).* *Provide mortgage assistance for low- and moderate-income first-time homebuyers, prioritizing advertising to persons in higher opportunity areas (Program 12).* ***Encourage landlords and property managers in high resource areas to advertise their units to Section 8 voucher holders (Program 11).*** ***Provide education to landlords and property managers on fair housing rights and requirements/discrimination (Program 30).***
Barriers to homeownership, particularly for communities of color	***Historical redlining and barriers to building generational wealth.*** *Shortage of affordable homeownership opportunities, particularly for smaller, entry-level households.* ***Household income growth that has not kept pace with housing costs.*** *Outside demand for housing from relocating Bay Area residents with higher-paying jobs.* *Conversion of older single-family housing stock to rental properties.*	***Offering programs to remove racially restrictive covenants on city and private property (Program 32)*** ***Continue to operate program for downpayment assistance for first-time homebuyers (12)*** *Encourage construction of Accessory Dwelling Units targeting areas of higher resource opportunity (Program 6).* *Development Code revisions to address zoning to facilitate housing types serving lower-income households (Program 17).*

AFH IDENTIFIED ISSUES	CONTRIBUTING FACTORS	MEANINGFUL ACTIONS
Displacement risk due to economic pressures, particularly for lower-income households	***Rising housing costs outpacing wage increases.*** ***Cost of repairs and rehabilitation.*** *Lack of affordable multifamily rental housing at appropriate sizes, resulting in overcrowding or overpayment when renters are pushed into single-family home rental market.* *Low rental vacancy rates.* ***Outside demand for housing from relocating Bay Area residents with higher-paying jobs intensifies gentrification and competition for housing resources.*** *Loss of naturally occurring affordable housing resources.*	*Continue to develop infill projects and address brownfield remediation in the Downtown and Greater Downtown (Program 7).* *Encourage landlords and property managers in high resource areas to advertise their units to Section 8 voucher holders (Program 11).* *Encourage construction of Accessory Dwelling Units targeting areas of higher resource opportunity (Program 6).* *Provide exemptions from fees for certain projects to prevent added costs for new units (Program 18).* *Preserve existing subsidized affordable units at-risk for conversion to market-rate (Program 21).* ***Continue to operate the housing rehabilitation programs and improve communication about the program to eligible owners of mobile homes and rental properties (Program 22).*** ***Continue code enforcement in targeted areas (Program 23).*** ***Comply with State law regarding replacement of existing affordable units (Program 24).*** *Encourage the construction of affordable units with three or more bedrooms and incentivize on-site childcare and support services in mixed use and multifamily developments (Program 30).* ***Assist the development of affordable housing using State and federal funds (Program 12).*** *Provide support for low-income renters, including multilingual tenant counseling, rental assistance, financial counseling, crisis stabilization services, and legal support (Program 30).* *Provide programs for property owners to finance the purchase and installation of infrastructure improvements to their properties (Program 14).* *Provide voluntary energy assessments for housing units built prior to November 1, 2002 (Program 15).* ***Provide weatherization services (Program 16).***

AFH IDENTIFIED ISSUES	CONTRIBUTING FACTORS	MEANINGFUL ACTIONS
Disproportionately limited access to resources for lower-income and communities of color households	***Discriminatory lending and other barriers to home ownership for non-White populations, including language barriers and documentation requirements.*** *Concentration of renters, lower-income households, and non-White residents near high-intensity commercial and industrial uses, circulation, and rail corridors in Downtown, South Stockton, East Stockton, and residential areas in central Stockton.* *Concentration of assisted affordable housing resources in Low resource tracts, Areas of High Segregation and Poverty, and R/ECAPS.*	*Continue to repair and replace public facilities in lower-income neighborhoods (Program 4).* *Continue to develop infill projects and address brownfield remediation in the Downtown and Greater Downtown (Program 7).* ***Implement multilingual communication and outreach strategies (Program 30).*** ***Offering programs to remove racially restrictive covenants on city and private property (Program 32).*** *Address environmental impacts and increase amenities in areas with concentrations of renters, lower-income households, and non-White residents (Program 31).* *Produce affordable rental housing in opportunity-rich locations near transit, services, and key amenities (Programs 5,8,12).* *Explore additional community benefit options that could be included in the criteria for initiating modified and new Development Agreements (Program 19).* *Disperse Sites Suitable for Lower Income Housing to Affirmatively Further Fair Housing (Program 33)*
Homeless individuals and families	***High rates of unsheltered individuals.*** *Increasing proportion of employed homeless face challenges in securing housing.*	***Continue to support organizations assisting homeless persons (Program 25).*** *Encourage landlords and property managers in high resource areas to advertise their units to Section 8 voucher holders (Program 11).*

HOUSING SITES INVENTORY

4

INTRODUCTION

California law (Government Code Section 65583 (a)(3)) requires that the Housing Element contain an inventory of land suitable for residential development, including vacant sites that can be developed for housing within the planning period and nonvacant (i.e., underutilized) sites with potential for redevelopment. State law also requires an analysis of the relationship of zoning, potential environmental hazards, and infrastructure available to these sites.

REGIONAL HOUSING NEEDS ALLOCATION

The Regional Housing Needs Allocation (RHNA) is the State of California–required process that seeks to ensure cities and counties are planning for enough housing to accommodate all economic segments of the community. The process is split into the following three steps.

1. Regional Determination. The California Department of Housing and Community Development (HCD) provides each region with a regional determination of housing need, which includes a total number of units split into four income categories—above moderate, moderate, low, and very low income. The City of Stockton is within the region covered by the San Joaquin Council of Governments (SJCOG). The 6th cycle RHNA for San Joaquin County as a whole is 52,719. This is the total number of units that the jurisdictions of SJCOG must collectively plan to accommodate in the unincorporated county and the cities of Escalon, Lathrop, Lodi, Manteca, Ripon, Tracy, and Stockton.
2. RHNA Methodology. Councils of Governments (COG), including SJCOG, are responsible for developing a RHNA methodology for allocating the regional determination to each city and county in the COG's region. This methodology must further specific state objectives, including but not limited to promoting infill, equity, and environmental protection; ensuring jobs-housing balance; and affirmatively furthering fair housing. SJCOG developed a methodology to suballocate the county-level projection to the unincorporated county and the cities of Escalon, Lathrop, Lodi, Manteca, Ripon, Tracy, and Stockton. Of the total 52,719 units in the SJCOG region, 12,673 are allocated to the City of Stockton. SJCOG's methodology and unit allocations were approved by HCD in 2022.
3. Housing Element Updates. Each city and county must then adopt a housing element that demonstrates how the jurisdiction can accommodate its assigned RHNA through its zoning. HCD reviews each jurisdiction's housing

element for compliance with state law. This Housing Element covers the 6th cycle planning period, which is from December 31, 2023, through December 31, 2031. HCD directs local agencies to calculate the projected housing need for extremely low-income households by applying one of two methodologies to the RHNA for very low-income households: 1) use available U.S. census data to calculate the percentage/number of very low-income households that qualify as extremely low-income households; or 2), as used herein, presume that 50.0 percent of very low-income households qualify as extremely low-income households. As shown in Table HE-50, the City's total RHNA for 2023 to 2031 is 12,673 units. Of these units, the City must plan to accommodate 2,465 units for very low-income households, of which 50.0 percent are assumed to be affordable to extremely low-income households (<30.0 percent of median income), 1,548 units for low-income households, 2,572 units for moderate-income households, and 6,088 units for above moderate-income households.

Table HE-50: Stockton's 2023-2031 RHNA by Income Category

INCOME CATEGORY	RHNA UNITS	RHNA PERCENTAGE
Very Low Income (<50% of Median Income)*	*2,465*	*19.5%*
Low Income (50-79% of Median Income)	*1,548*	*12.2%*
Moderate Income (80-120% of Median Income)	*2,572*	*20.3%*
Above Moderate Income (>120% of Median Income)	*6,088*	*48.0%*
Total	***12,673***	***100%***

Source: California Department of Housing and Community Development; San Joaquin County Subregion 6th Cycle Regional Housing Needs Allocation, Final Methodology.
*It is assumed that 50 percent of very low-income units will be for extremely low-income households.

AVAILABILITY OF LAND

State housing element law emphasizes the importance of adequate land for housing and requires that each housing element "… identify adequate sites … to facilitate and encourage the development of a variety of housing types for all income levels…" (California Government Code Section 65583(c)(1)). To allow for an adequate supply of new housing, land must be zoned at a variety of densities to ensure that development is feasible for a wide range of income levels. The identified land must also have access to appropriate services and infrastructure, such as water, wastewater, and roads.

To demonstrate the City's capacity to meet its RHNA, an adequate sites inventory was conducted. The inventory must identify adequate sites that will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of housing types for households of all income levels.

The analysis of the relationship of suitable sites to zoning provides a means for determining the realistic number of dwelling units that could actually be constructed on those sites in the current planning period. The analysis also identifies the zoning districts the City believes can accommodate its share of the regional housing needs for all income levels.

The sites in the City's inventory are currently available. These sites will allow for the development of a variety of housing types that will meet the needs of all income groups as per the City's RHNA for the 2023-2031 planning period.

SITES SUITABLY ZONED FOR RESIDENTIAL USES AT APPROPRIATE DENSITIES

Housing element law requires jurisdictions to provide a requisite analysis showing that zones identified to accommodate the RHNA at each income level allow appropriate housing types at appropriate densities sufficient to encourage development to meet the needs of all households.

To meet the lower-income RHNA, the law provides two options for preparing the analysis: 1) describe market demand and trends, financial feasibility, and recent development experience; or 2) use default density standards deemed adequate to meet the appropriate zoning test (California Government Code Section 65583.2(c)(3)(B)). The default density designated by HCD for Stockton is 30 units per acre. As demonstrated herein, the City has a surplus of suitably zoned sites to meet its RHNA.

To meet the moderate- and above moderate-income RHNA, AB 725 requires the following:

1. At least 25 percent of the units counted towards the City's moderate-income RHNA are on sites where at least 4 units per acre but not more than 100 units per acre are allowed.
2. At least 25 percent of the units counted towards the City's above moderate-income RHNA are on sites where at least 4 units per acre are allowed.

As shown in **Table A-1** in **Appendix A,** Stockton's land inventory is in compliance with AB 725, because all sites identified to meet the moderate- and above moderate-income RHNA allow more than 4 units per acre and approximately 86 percent of the units counted towards the City's moderate-income RHNA are on sites where fewer than 100 units per acre are allowed.

SITES IDENTIFIED IN PREVIOUS HOUSING ELEMENTS

Pursuant to Government Code Section 65583.2(c), any nonvacant sites identified in the 5th housing element cycle or vacant sites identified in two or more consecutive housing element planning periods shall be provided by-right development when at least 20 percent of the units in the proposed development are affordable to lower-income households. **Table A-1** in **Appendix A** identifies the 80 sites with capacity for the City's lower-income RHNA that were also included in both prior cycles. All sites are vacant.

Per **Program 3, Sites Included in Previous Housing Elements**, the City will update all required Development Code and General Plan provisions to allow projects that have at least 20 percent affordable units (extremely low, very low, or low) without discretionary review or "by right." Multifamily housing (including projects that are 100 percent residential) is already permitted by right in most of the zones where these sites are (CD, CG, CN, CO and RH). The City will ensure it complies with Government Code Section 65583.2(c) for all applicable sites identified in **Table A-1** in **Appendix A.**

REALISTIC CAPACITY

For the pipeline projects summarized in **Tables HE-53** and **HE-54**, the realistic capacity is based on the project design as approved by the City of Stockton or as submitted by the applicant. (See **Table A-2** in **Appendix A** for parcel-level data on the pipeline project sites.) Development capacity for vacant and underutilized sites listed in **Table HE-53** is based on allowed density and historical residential and mixed-use development trends in the city, as described herein. (See **Table A-1** in **Appendix A** for parcel-level data on the vacant and underutilized sites.)

- For the sites in the RH, RL, RL and RM zones, the assumed realistic capacity is 80 percent of the maximum allowed units. This assumption is supported by recent project trends on sites with this type of zoning averaging 88 percent of maximum allowed

density or units per acre. Eighty percent is a slightly more conservative assumption.

- For the sites in the CD, CG, CN, CL, and CO zones, the assumed realistic capacity is 44.6 percent of the maximum allowed units. Projects that are 100 percent residential are permitted in these zones, but the assumed realistic capacity accounts for the potential for a mixture of commercial and residential uses. As shown in Table HE-53, several residential developments have been built recently in commercial districts.

In addition, the City reviewed the sites with zoning that allows non-residential uses in the City's currently adopted Housing Element (2015-2023) in addition to other sites with this type of zoning where residential has been built or approved, and compared that with the current uses on the site. The details about the sites analyzed are below:

- 339 vacant sites that allow non-residential uses were in the existing Housing Element inventory or are developed or approved with residential units in the city. Most of the sites from the existing Housing Element have not developed or been approved for development.
  - 25 of the sites evaluated (some made up of multiple parcels) have approved or built projects on them.
    - 13 of the sites have built or planned non-residential uses on them.
    - 12 of the sites have built or planned residential uses on them:
      - Eight are built with all residential units
      - Four are mixed-use and the percent of the project that is residential for each one is one at 69% two at 75%, and one at 96% residential

Based on this analysis, 44.6% of sites that allow residential are permitted or built with residential uses. This analysis resulted in the identification of a need to adjust realistic capacity assumptions on this type of site from 50% to 44.6%. Additional analysis of realistic capacity on sites that allow non-residential uses was conducted using the following formula: number of projects/sites in the list of sites referenced above that allow non-residential divided by the total number of projects approved/built on sites that allow non-residential (above)multiplied by the built density (% out of 100) of the projects above that included residential. Below is the formula using the numbers for Stockton:

12/25 X 85% = 41%

Forty-one percent is a bit lower than the 44.6% number arrived at using the City's track record. However, the City is committing to implementing several programs to support residential or mixed-use development on sites and in zoning districts that allow non-residential uses. These include:

- Program 2: Downtown Implementation – As called for in the Climate Action Plan and General Plan the City shall continue to implement measures to enable development of 4,400 residential units in the Greater Downtown Area by 2035. This will include adoption and implementation of the Housing Action Plan. The majority of Housing Element sites that allow non-residential uses are located within the Downtown and Greater Downtown.
- Program 5: Housing and Neighborhood Action Plans - The City is currently preparing a Housing Action Plan (HAP) to provide a guidebook with information to interested developers and property owners about residential opportunities in the city. This plan includes the 10 top priority sites the City has identified as "shovel-ready" for housing development. Eight of the 10 sites are in zoning districts that allow non-residential uses. Selection of the priority sites was based on financial feasibility analysis and policy goals. The HAP will be marketed and provided to potential developers upon completion. Implementation of the HAP will include marketing and incentivizing development of missing middle housing types including tiny homes, cottage homes, single-room occupancy units, duplexes, triplexes and fourplexes. Incentivizing housing types such as single-room occupancy units and tiny homes is expected to create new housing

opportunities for extremely low-income households. The HAP will be completed in 2024.

- Program 7: Infill Strategy - The City shall continue to implement the Downtown Infrastructure Infill Incentive Program or explore other financing strategies to facilitate the development of infill projects in the Downtown and Greater Downtown areas. The Downtown Infrastructure Infill Incentive Program provides financial incentives to eligible parties in developing new market-rate residential, commercial, or mixed-use projects in Downtown Stockton. Under the Downtown Infill Infrastructure Program, eligible development projects may receive a reimbursement for certain public infrastructure improvements based on the project meeting certain criteria including a threshold number of residential units or square footage, being within the qualifying geographic area, investing at least $500,000, and needing public infrastructure improvements of at least $100,000. The program identifies actions and incentives to promote infill development, including brownfield remediation. The majority of Housing Element sites that allow non-residential uses are located within the Downtown and Greater Downtown.
- Program 9: Government-Owned Sites - The City will facilitate housing development on City-owned sites by issuing RFI/SOQs for development, complying with the Surplus Lands Act (SLA), and entering into Development and Disposition Agreements with developers. The City will facilitate housing development on sites owned by the Stockton Unified School District (SUSD) by coordinating with SDSU to encourage housing development. Many of these sites are in the zoning districts allowing non-residential uses.
- Program 17: Development Code Revisions – this program calls for updates to the City's Development Code. The City is finishing a comprehensive update to its Development Code in 2024 and all of the amendments in Program 17 will be part of that comprehensive update. There are a number of amendments included in this program that will facilitate residential projects in zoning districts that allow non-residential uses including expanding the types of residential uses allowed in these zones, explicitly stating that 100 percent residential projects are allowed in these zones, increasing maximum heights, decreasing required setbacks, decreasing minimum open space per multifamily unit, and amending the code to encourage former industrial areas to transition to other uses.

These assumed realistic capacities are feasible given current development standards and on-site improvement requirements (e.g., setbacks, building height, parking, density requirements, land use controls, water and wastewater access, and open space requirements)

Table HE-51 summarizes how the various factors in housing element statute (Government Code Section 65583.2(c)(2) result in an adjusted average site capacity of 80 percent of the maximum densities in the residentially zoned areas of Stockton. Table HE-52 summarizes how the various factors in housing element statute (Government Code Section 65583.2(c)(2) result in an adjusted average site capacity of 44.6 percent of the maximum densities in the areas of Stockton where sites are identified that also allow non-residential uses.

Table HE-51: Capacity Adjustment Factors – Residential Zones

CAPACITY FACTOR	ADJUSTMENT	REASONING
Land use controls and site improvements	*88%*	*For net acreage due to on-site improvements (sidewalks, easements).*
Realistic capacity of the site	*80%*	*Adjustment based on past redevelopment trends*
Typical densities	*88%*	*Recently approved projects on residentially zoned sites are between 71-95% of maximum capacity*
Infrastructure available	*85%*	*Most sites have utilities available, development of utility connections needed on some sites*
Environmental constraints	*95%*	*Environmental Constraints have minimal impact on whether the sites can be developed. Mitigation for environmental hazards will also limit the impacts of environmental constraints.*

Source: City of Stockton, 2024

Table HE-52: Capacity Adjustment Factors – Other Zones

CAPACITY FACTOR	ADJUSTMENT	REASONING
Land use controls and site improvements	*88%*	*For net acreage due to on-site improvements (sidewalks, easements).*
Realistic capacity of the site	*44.6%*	*Adjustment based on past development trends*
Typical densities	*58%*	*Recently approved 100% residential projects are between 41-83% of maximum capacity*
Infrastructure available	*85%*	*Most sites have utilities available, development of utility connections needed on some sites*
Environmental Constraints	*95%*	*Environmental Constraints have minimal impact on whether the sites can be developed. Mitigation for environmental hazards will also limit the impacts of environmental constraints.*

Source: City of Stockton, 2024

REPRESENTATIVE PROJECTS

As shown in Table HE-53, several recent projects support the viability of the sites in the inventory and the assumed realistic capacities.

Table HE-53: Representative Projects

PROJECT NAME	ADDRESS	APN	GENERAL PLAN	ZONING	ACREAGE	UNITS	MAXIMUM ALLOWED DENSITY	DENSITY (UNITS PER ACRE)	PERCENT OF ALLOWED DENSITY	NOTES
Anchor Village	*133 E Oak St 601 N Hunter St*	*139-060-43*	*Commercial*	*CD*	*0.69*	*50*	*87*	*72.5*	*83%*	*Built in 2018.*
Cal Weber 40 Apartments	*512 E Weber Ave.*	*149-170-31 149-170-32 149-170-33*	*Commercial*	*CD*	*0.76*	*40*	*87*	*52.6*	*60%*	*Built in 2016. Adaptive reuse of existing buildings. Downtown redevelopment. Mixed use with ground-floor commercial; 39 units affordable to low- and very low - income families and one unit for the on-site manager. LIHTC, City, HOME, HACSJ funding, HCV-PB.**
Crossway Residences	*448 South Center Street*	*149-062-14*	*Commercial*	*CD*	*1.12*	*41*	*90*	*36.6*	*41%*	*Built in 2020 and 2021. Three separate buildings with a total of 41 units. Affordable supportive housing for SJC Behavioral Health. Redevelopment of HACSJ's former administrative offices. HACSJ funding through the Mental Health Services Act, HCV-PB.**
Eight Mile House Apartments	*2829 Breaker Way*	*070-670-02*	*HDR*	*RH*	*13.5*	*384*	*30*	*28.4*	*95%*	*Under construction.*
Grand View Village	*228, 240, and 250 N. Hunter Street and 241 N. San Joaquin Street*	*139-130-28*	*Commercial*	*CD*	*0.79*	*75*	*136*	*94.9*	*70%*	*Under construction. Downtown redevelopment. 100 percent affordable. Grocery store and community spaces. LIHTC, City, CDBG and HOME funding.**
Liberty Square Apartments	*804 N Hunter St*	*139-055-01*	*Admin Prof*	*CO*	*1.76*	*74*	*90*	*42.0*	*n/a – existing building*	*Under construction. Adaptive reuse of offices. 100 percent affordable to VLI, City, HUD, AHSC funding*.*
Medici Artist Lofts	*242 N. Sutter St*	*139-370-01*	*Commercial*	*CD*	*0.33*	*34*	*136*	*103.0*	*n/a – existing building*	*Built in 2020. Adaptive reuse of offices. 27 units affordable to low income, 7 market rate. Local artists preference. LIHTC, City, HOME, HACSJ funding, HCV-PB.**
Morada Crossings (Palms at Morada)	*4142 E Morada Ln*	*124-290-28 124-290-30*	*HDR*	*RH*	*10.17*	*216*	*30*	*21.2*	*71%*	*Built in 2021.*
New Apartments	*709 N Center St*	*137-180-30*	*HDR*	*CN*	*0.81*	*36*	*90*	*44.4*	*49%*	
Sierra Vista Phase I and Phase II	*1501 Twelfth Street*	*169-270-03*	*MDR*	*RM*	*13.4*	*215*	*17.4*	*16.2*	*93%*	*Built in 2020. 100 percent affordable. LIHTC, HACSJ funding, HCV-PB.**
Sonora Square (HASJC)	*431 S El Dorado St,*	*14906217*	*Commercial*	*CD*	*0.92*	*37*	*90*	*40.2*	*45%*	*Under construction. Permanent supportive housing. 100 percent affordable to low income, Housing Authority LIHTC, NPLH, CDBG. HACSJ funding, HCV-PB.**
Stonebrier Apartments	*4770 West Ln*	*096-140-71*	*HDR*	*RH*	*5.49*	*156*	*30*	*28.4*	*95%*	*Built in 2020.*
Average Percentage of Maximum Allowed Density – Residentially Zoned Sites	*88%*									
Average Percentage of Maximum Allowed Density – Non-Residentially Zoned Sites	*58%*									

Source: City of Stockton, 2023.

* AHSC = Affordable Housing and Sustainable Communities; CDBG = Community Development Block Grant; HACSJ = Housing Authority of the County of San Joaquin; HCV-PB = Housing Choice Voucher, Project Based; LIHTC = Low Income Housing Tax Credit; NPLH = No Place Like Home.

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SUMMARY OF APPROACH TO MEETING RHNA

As shown in **Table HE-54**, the City's approach to meeting its RHNA relies on pipeline projects, vacant sites, and anticipated development of accessory dwelling units (ADU) and junior ADUs (JADU). Using this approach, the City has a surplus of sites available to meet its 2023-2031 RHNA by income category. **Tables A-1** and **A-2** in **Appendix A** provide the characteristics of each site, including zoning, general plan designation, acreage, and realistic capacity for the sites currently zoned for housing. These sites are all likely to be developed with residences during the planning period.

Maps of the pipeline projects and vacant sites are provided in **Appendix A.** Anticipated ADU/JADU construction could occur in neighborhoods throughout the city. Therefore, it's considered a non-site-specific approach to meeting RHNA and is not mapped.

To ensure that the City has sufficient capacity to accommodate the RHNA throughout the planning period, HCD recommends in its "Housing Element Site Inventory Guidebook" (Government Code Section 65583.2) that the City create a buffer in the sites inventory of 15 to 30 percent more capacity than required, especially for capacity to accommodate the lower-income RHNA. As shown in **Table HE-54**, the city has taken this approach and assumed a 30 percent buffer across all income categories.

Table HE-54: Approach to Meeting 2023-2031 RHNA

INCOME CATEGORY	RHNA	RHNA WITH 30% CUSHION	PIPELINE PROJECTS	VACANT SITES	ANTICIPATED ADUS	TOTAL CAPACITY	SURPLUS OF RHNA	SURPLUS OF RHNA WITH 30% CUSHION
Extremely Low Income	*1,232*	*1,602*	*198*	*1,526*	*-*	*1,724*	*492*	*122*
Very Low Income	*1,233*	*1,603*	*253*	*1,526*	*-*	*1,779*	*546*	*176*
Low Income	*1,548*	*2,012*	*145*	*1,525*	*108*	*1,778*	*230*	*-234*
Moderate Income	*2,572*	*3,344*	*353*	*2,932*	*54*	*3,339*	*767*	*-5*
Above Moderate Income	*6,088*	*7,914*	*13,643*	*718*	*18*	*14,379*	*8,291*	*6,465*
Total	***12,673***	***16,475***	***14,592***	***8,227***	***180***	***22,999***	***10,326***	***6,524***

Source: City of Stockton, 2024.

PROGRAMS TO ENCOURAGE AND FACILITATE HOUSING DEVELOPMENT

The City will encourage and facilitate housing development through several actions.

- **Program 6. Accessory Dwelling Units**: The City will update its ADU regulations as needed throughout the planning period to address changes to state law and encourage the construction of ADUs through a range of strategies, including providing guidance, educational materials and preapproved ADU plans, proactively advertising the benefits of ADUs, and monitoring the success of this program.
- **Program 7. Infill Strategy:** The City will promote infill development with a variety of strategies that may include assisting with brownfield remediation, flexible development standards, planning infrastructure improvements, and streamlining the permitting process.

- **Program 8. Infill Site Assembly:** The City will promote infill development by actively working with local property owners and developers to assist in the consolidation and assembly of small infill parcels for residential projects, processing lot mergers ministerially and offering incentives.
- **Program 9. Government-Owned Sites:** The City will facilitate housing development on City-owned sites by issuing RFI/SOQs for development, complying with the Surplus Lands Act (SLA), and entering into Development and Disposition Agreements with developers. The City will facilitate housing development on sites owned by the Stockton Unified School District (SUSD) by coordinating with SDSU to encourage housing development.
- **Program 10. Large Site Development:** The City will facilitate the development of sites larger than 10 acres.
- **Program 12. State and Federal Funding**: The City will support housing organizations and affordable housing developers by assisting in applications for funding, drafting letters of support and resolutions, and identifying potential sites for affordable housing.
- **Program 20. Density Bonus**: The City will continue to offer and promote the use of density bonuses.

PIPELINE PROJECTS

The City currently has 20 pipeline projects, for a total of 14,592 units that can be counted toward the City's RHNA. Anticipated units are based on the project design as approved by the City of Stockton or as submitted by the applicant. Of the 20 pipeline projects, 8 are 100 percent affordable (may include a moderate or above-moderate manager's unit). Of the total 14,592 units, 596 are in the lower-income category, 353 are in the moderate-income category, and the remaining 13,643 are in the above moderate-income category. **Table A-2** in **Appendix A** provides parcel-level data on the pipeline project sites. A brief description of each pipeline project is included herein. Maps of the pipeline projects, vacant sites, and underutilized sites are provided in **Appendix A**.

Table HE-55: Pipeline Projects Summary

PIPELINE PROJECTS	TOTAL ACRES	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE INCOME CAPACITY	TOTAL CAPACITY
Alicia Place	*3.68*	*76*	*0*	*1*	*77*
Calaveras Quarters Motel Conversion	*2.14*	*68*	*1*	*0*	*69*
Cannery Park	*291.80*	*0*	*32*	*490*	*522*
Crystal Bay	*174*	*0*	*67*	*1,276*	*1,343*
Delta Cove	*359.52*	*0*	*77*	*1,468*	*1,545*
Elderberry Residential Project	*18.8*	*0*	*0*	*42*	*42*
Fairview Terrace	*1.61*	*76*	*0*	*0*	*76*
Grand View Village	*0.79*	*75*	*0*	*0*	*75*
Harding Apartments	*1.02*	*0*	*4*	*18*	*22*
Hunter House New Apartments	*0.69*	*120*	*0*	*0*	*120*
La Passeggiata Affordable Housing Project	*0.83*	*94*	*0*	*0*	*94*
Mobile Homes on El Dorado	*7.06*	*0*	*18*	*104*	*122*
Park Center Apartments	*0.98*	*50*	*0*	*1*	*51*
Sanctuary	*1,950.46*	*0*	*0*	*5,758*	*5,758*
Sonora Square Apartments	*0.92*	*37*	*0*	*0*	*37*
Swain Crossing Apartments	*1.58*	*0*	*5*	*31*	*36*
Tra Vigne	*318.05*	*0*	*0*	*1,503*	*1,503*

PIPELINE PROJECTS	TOTAL ACRES	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE INCOME CAPACITY	TOTAL CAPACITY
Trinity Parkway Apartments	*4.32*	*0*	*18*	*102*	*120*
University Park	*103.47*	*0*	*0*	*359*	*359*
Westlake at Spanos Park	*347.08*	*0*	*131*	*2,490*	*2,621*
Total	***3,588.8***	***596***	***353***	***13,643***	***14,592***

Source: City of Stockton, 2023.

ALICIA PLACE

The Alicia Place project proposes the conversion of an existing hotel into 77 individual residential units, including a manager's unit. It will be a 100% affordable housing development designed to cater to larger households facing homelessness, with income levels at or below 30% of the Area Median Income (AMI). The project will provide 47 studios, 24 one-bedroom apartments, and 6 two-bedroom apartments, catering to a range of household sizes and needs.

As of November 2023, the applicants are currently working with the Economic Development Department (EDD) and the state to secure funding for this project. The project has been awarded funding through the HHAP Grant Program.

The project is anticipated to receive its planning entitlement approval in early 2024. The initial timeline set by the developers aimed for project completion and Certificate of Occupancy acquisition by June 2024.

CALAVERAS QUARTERS MOTEL CONVERSION

The Housing Authority of the County of San Joaquin (HACSJ) will convert an existing 122-unit motel into 68 deed-restricted housing units affordable to lower-income households and one manager's unit affordable to a moderate-income household. The application requests a density bonus of 35 percent per municipal code Section 16.40. As of January 2023, this project was in the site plan review and design review phase. The project will have project-based vouchers and provide permanent housing for those experiencing chronic homelessness, homeless youth, and youth at risk of homelessness. The 2.14-acre parcel on March Lane will have 11 ADA ground-floor units and 7 units designated for the hearing and visually impaired. The newly converted property will also have a community room, laundry facilities, and substantial assigned parking for residents. Partners for this project include Parents by Choice, Aspirant, Lutheran Social Services of Northern California, Mary Magdalene Community Service, STAND, and Children's Home of Stockton. These partners will provide case management, life skills training, behavioral health services, education and employment services, legal assistance, parenting classes, and addiction recovery services for the residents of Calaveras Quarters.

Out of the total projected cost of $30,220,000, HomeKey Program, Round 2, has provided $24.9 million, and $6.5 million has been secured by the City of Stockton American Rescue Plan (ARPA). The City of Stockton is the responsible entity, and the HACSJ would be the recipient. The project site is currently developed with former motel buildings and accompanying parking lot. The land on which the existing structure is located is entirely urbanized, as are the adjacent parcels.

CANNERY PARK

Per the executed Development Agreement, the Cannery Park project will be built on approximately 450 acres of land at the southwest corner of State Route 99 and Eight-Mile Road. Of the original 450 acres, a remaining 291.82 acres are available for residential development. It will include new residential areas, 1,452,508 square feet of light industrial business parkland, and 1,078,763 square feet of commercial land. During the planning period, the City anticipates that 312 new single-family homes and 210 multifamily homes will be constructed. Of the total 522 homes, it is anticipated that 490 will be affordable to above-moderate income

households, and 32 will be affordable to moderate-income households.

Recently, Community Facilities District 2005-1 and Community Facilities District CFO 2019-1 were established, and LGJ Homes acquired Cannery Park units 6 through 9, consisting of 387 single-family lots, and recorded final subdivision maps, constructed public improvements, and started single-family home construction and sales. KB Home North Bay LLC acquired Cannery Park units 10 through 12, consisting of 128 single-family lots, and subsequently recorded final subdivision maps, constructed public improvement, and started single-family home construction and sales. Construction of the Holman Road Bridge over Bear Creek was started with an anticipated completion date of spring 2023. There is no remaining barrier to development because the project is in the final stages of development. Future submittals for Cannery residential uses include ministerial design review for the residential units (master plan homes and apartments), improvements plan for the grading, and recordation of the final map. Though apartment complexes are allowed by right and only require ministerial review, should the applicant request condominiums, a subdivision map would need approval prior to the recordation of the new condominium lots. The applicant has requested to convert most of the Regional Commercial area in the subdivision to over 300 additional single-family homes beyond the original approval. That conversion requires a rezone and new subdivision map and would have to be approved by the Planning Commission and City Council. The applicant anticipates that approval in 2023, with ministerial design review and construction of the additional homes shortly thereafter, depending on the housing market.

CRYSTAL BAY

According to the executed development agreement, the Crystal Bay project will be built on approximately 174 acres of land on the south side of Eight Mile Road, east of Rio Blanco Road, and west of Westlake Drive. A wide variety of park and open space amenities will be included. During the planning period, the City anticipates that 1,343 new homes will be constructed. The Crystal Bay project was originally approved as a part of the development agreement for the Westlake at Spanos West Master Development Plan and is included in the Spanos West Business Park Density Transfer Agreement. Of the 1,343 homes, it is anticipated that 1,276 will be affordable to above-moderate income households, and 67 will be affordable to moderate-income households.

On April 10, 2008, the Stockton Planning Commission approved the Crystal Bay Development Agreement (expires January 10, 2040), Planned Unit Residential Development (PURD) standards, a Vesting Tentative Map of Tract No. 3585, and the environmental impact report for the project area. The PURD standards are the primary regulatory document for the master-planned community and go beyond zoning to regulated use and design. The standards allow a variety of residential and nonresidential uses and permit a wide variety of housing types due to the increased flexibility of the PURD. This residential flexibility includes multiunit housing (duplex, triplex), courtyards, mobile homes, organizational housing, townhouses, and senior housing. Most residential land uses are medium density (806 units at 8.8 to 17.4 units/acre) and high-density housing (392 units at 17.5 to 29.0 units/acre).

The development of Crystal Bay is planned as an extension of the Westlake subdivision, which is immediately adjacent to the project and currently under development. Accordingly, the extension of infrastructure, services, and roads is a shared effort. The projects entered into a cost-sharing agreement with the objective of phasing the extensions in a cost-effective, orderly, and complete fashion. There are no major barriers left to prohibit construction because any regional impact was addressed during the initial construction of the Westlake project. Future submittals for residential uses include ministerial design review for the residential units (master plan homes and apartments), improvements plan for the grading, and recordation of the final map. While apartment complexes are allowed by right and only require ministerial review, should the applicant request condominiums, a subdivision map would need approval prior to the recordation of the new condominium lots. Construction of Crystal Bay is anticipated to begin before the end of 2025 and be completed within the planning period.

DELTA COVE

Per the executed development agreement, the Delta Cove project is facilitated by a general plan amendment, rezone, a planned development, a vesting tentative map, and an addendum/initial study to a previously certified environmental impact report for a project also known as "Delta Cove." The project will include new residential areas (including single-family detached homes and a condominium project) with parks, open space, and commercial use on three vacant parcels totaling 360 acres. During the planning period, the City anticipates that 1,545 new homes will be constructed, and it is anticipated that 1,468 will be affordable to above-moderate income households, and 77 will be affordable to moderate-income households.

The project is designed to provide pedestrian connectivity throughout the development, avoid wetlands, provide more park/open space and recreational uses, and provide a healthier living environment utilizing the live, work, play concept. Delta Cove proposes a variety of single-family attached and detached housing options (approximately 1,164 units) as well as multifamily/condominium housing options (approximately 381 units) and Commercial Neighborhood (CN) employment and retail use. The project encourages a mix of housing types and lot sizes by incorporating the traditional single-family home with cluster products, alley-loaded products, small-lot products, mixed-use, and condominium housing types. Lot sizes range from 32 feet x 68 feet (2,000 square feet) to 55 feet x 100 feet (5,500 square feet).

There are no major barriers left to prohibit construction because any regional impact was addressed during the initial construction of the Westlake and Spanos West projects nearby. Future submittals for residential uses include ministerial design review for the residential units (master plan homes and apartments), improvements plan for the grading, and recordation of the final map. While apartment complexes are allowed by right and only require ministerial review, should the applicant request condominiums, a subdivision map would need approval prior to the recordation of the new condominium lots. Construction of Delta Cove is anticipated to begin before the end of 2025 and be completed within the planning period.

ELDERBERRY RESIDENTIAL PROJECT

Per the provisions of the planned development permit, the Elderberry Residential project will consist of 42 single-family dwellings for a senior housing project. As of January 2023, this project was in the process of applying for a tentative subdivision map, planned development permit, and design review to subdivide the 17.32-acre site into 43 parcels to facilitate the development. Forty-two parcels will be constructed with single-family homes on the south side of Villa Point before the end of the planning period. The forty-third parcel on the north side of Villa Point will be reserved for future multifamily development.

The project includes roadway improvements, landscaping, open space, common areas, and at least one amenity (e.g., recreational facility, parks and play fields, tot lots). Future submittals for residential uses include ministerial design review for the residential units (master plan homes), improvements plan for the grading, and recordation of the final map. While the 42 units are intended to be market rate, the applicant could request a ministerial affordable housing agreement with the City to convert some of the units in the future to help secure funding.

FAIRVIEW TERRACE

In May 2023, the City sold 2 parcels, totaling 1.27 acres to STAND. STAND is a group of residents working together in the Southeast Stockton neighborhood on several affordable housing programs. STAND proposes to develop a 4-story senior housing development with associated on- and off-site improvements on this site in the CG (Commercial, General) Zoning District. The project is located at the southeast corner of South Airport Way and East Eighth Street.

The project is eligible for a Tier-2 Supplemental Density Bonus of 100%. This allows for a number of concessions or incentives, including setback reductions, off-street parking reductions, waivers for lot coverage and floor area ratio (FAR), and building height increases.

The City of Stockton has approved a Site Plan Review, Design Review, and Density Bonus application for the development of a 76-unit, four-story affordable senior

housing project with 1,180 square feet of ground-floor commercial space and associated site improvements.

The project is a 100% affordable housing development for seniors with a household income at 30%-60% (low-/very-low) of the area median income. To ensure affordability, the project proponents will enter into a 55-year regulatory agreement (Density Bonus Housing Agreement) prior to occupancy. The project will also provide a mix of studio, one-bedroom, and two-bedroom apartments, catering to a range of household sizes and needs.

GRAND VIEW VILLAGE

The Grand View Terrace mixed-use project consists of 75 multifamily deed-restricted affordable housing units and approximately 16,893 square feet of ground-floor nonresidential uses in a four-story building. Units will be one-, two- and three-bedroom units for lower-income families. As of February 2023, demolition and site preparation work had begun.

The ground floor will include commercial spaces, offices, a community center, a Head Start, and a grocery store. Grand View Village will be a transit-oriented development, focusing on connecting the residents and surrounding community with employment providers, schools, the downtown regional transit center, and the Robert Cabral train station through enhanced services, new bicycle paths, and improved sidewalks. Residents will be offered free bus passes for three years.

The nonprofit developer, Visionary Home Builders of California, secured $37 million in funding from the state and the city of Stockton. No other permits or approvals are needed from the City.

HARDING APARTMENTS

This office conversion into apartments project will convert an office into multifamily housing (22 units) with exterior building revisions of the existing single-story building. As of January 2023, this project was in the process of design and site plan review. The project includes 4 studios, 16 one-bedroom, and 2 two-bedroom units with a small space for a shared office and gym. Future submittals for residential uses include improvements plan for the grading and building permits for unit construction. No other approvals are needed from the City. Due to their size, it is anticipated that the four studios would be affordable to moderate-income households. The remaining 18 units are anticipated to be affordable to above-moderate-income households. The applicant could request a ministerial affordable housing agreement with the City to convert some of the market-rate units to affordable in the future to help secure funding.

HUNTER HOUSE NEW APARTMENTS

The Hunter House New Apartments project consists of a new four-story, 120-unit apartment complex with a mix of one- and two-bedroom apartments, an underground garage, and 2920 square feet of nonresidential uses on the ground floor. There will be a community room, two elevators, two laundry rooms, and a workout and fitness area for tenants. The units will be restricted to households at the following income levels: 1) 72 units earning less than 30 percent average median income (AMI) (extremely low income); and 2) 48 units earning less than 50 percent AMI (very low income). The project will serve special needs populations such as the disabled, seniors, veterans, the mentally ill, and other people with special needs.

With assistance from SJCOG, Service First of Northern California received a $27 million Affordable Housing and Sustainable Communities (AHSC) grant to complete a funding package to build the project. The AHSC grant will help cover construction, programming, and transportation improvements (including a new railcar for the Altamont Corridor Express). The AHSC grant will cover street lighting, trees, drought-tolerant landscaping as well as street, sidewalk, and curb improvements, including bike lanes. The location is close to Downtown Stockton, the transit center, numerous civic institutions, commercial uses, and social services. As of January 2023, this project was in the design and site plan review phase. This will be the fifth affordable housing site that Service First will offer, after Winslow Village Apartments, Paulette's Manor, Coventry Apartments, and Zettie's Haven. The site is currently vacant. Only building permits are needed from the City before construction can begin.

LA PASSEGGIATA AFFORDABLE HOUSING PROJECT

The project consists of 94 deed-restricted affordable units for households at the following income levels:1) 78 units earning less than 50 percent AMI (very low income); and 2) 16 units earning less than 80 percent AMI (low income). Valley Home Builders, with Pearl Homes, will construct two buildings, connected by a bridge, that will serve as affordable housing for seniors and families in downtown Stockton. The buildings will have solar power, energy-efficient electrical appliances, smart home artificial intelligence, and rooftop gardens.

The project will be built on a surplus property controlled by the State Controller's Office that was identified as one of the first excess properties to be offered for development of affordable housing. The project will be the first modular multifamily development in Stockton. Visionary Home Builders was selected as the developer. The property is in the City's Miner Avenue Complete Street Project, a rehabilitation and beautification project. The project was awarded $18.5 million in Multifamily Housing Program funding. As of January 2023, project representatives were applying for an Infill Infrastructure Grant and Department of Toxic Substances Control funding to address site contamination. As of February 2023, project representatives were determining whether approvals and permits will be issued by the State or the City. The City is responsible for permits pertaining to utility connections, off-site improvements, and collection of required service and impact fees.

MOBILE HOMES ON EL DORADO

The Mobile Home project consists of a new, 122-unit mobile home complex with 183 parking spaces, drive aisles, landscaping, and lighting. As of January 2023, this project was in the administrative use permit phase. Of the 122 homes, it is anticipated that 104 will be affordable to above-moderate income households, and 18 will be affordable to moderate-income households.

The privately funded project is approved to proceed in obtaining construction permits; however, new mobile home parks are regulated at the State level under the California Mobile Home Act, which designates HCD as the review and approval authority for matters where the City does not have jurisdiction. Accordingly, HCD has primary jurisdiction over mobile-home park building permit applications.

The applicant is responsible for requesting City building permits for frontage (road) improvements and utility connections as well as the payment of all construction and service-related fees; however, an independent application, construction plans, and maintenance plan would need to be submitted to HCD as the responsible agency. No other approvals are needed through the City. Estimated plans and sales/lease information has not been provided to the State for their review. The City anticipates that the project will be completed during the planning period.

PARK CENTER APARTMENTS

The Housing Authority of the County of San Joaquin (HACSJ) has announced the development of Park Center Apartments, a permanent supportive housing project designed to provide affordable housing for individuals and families experiencing homelessness and mental illness. The project will consist of two buildings located at 709 N. Center Street.

The first building, a historic office building, will be redesigned and retrofitted to include 23 residential units and a manager's unit. The second building will be a new construction and will include 27 residential units. All 50 units will be affordable to individuals and families with incomes at or below 60% of the area median income. One unit will also be available at market value. The project will provide on-site supportive services to residents, including case management, mental health counseling, and substance abuse treatment. No existing residences are affected so no relocation plan is needed.

HACSJ has partnered with San Joaquin Behavioral Health Services (SJCBHS) to develop the project. SJCBHS will provide funding for the project through the Mental Health Services Act (MHSA). Park Center Apartments received site plan review and design review approval in February 2022. Construction of Park Center is expected to begin in early 2024 and be completed in late 2024.

SANCTUARY

Per the executed development agreement, the Sanctuary project will include new 5,758 homes, 483,984 square feet of offices, 208,272 square feet of retail, and approximately 100 hotel rooms as well as three lakes, a marina, a private river club, religious facilities, four schools, orchards, vineyards, a small winery, and extensive recreational open space. The entire Sanctuary property, which extends into the surrounding sloughs, totals 1,967 acres; however, the total land area is about 1,839 acres, including the adjacent levee, and only 1,72 8acres of the total land are considered developable; the remaining 111 acres consist of the Levee Walk. Project construction will include improvements to the existing levees. During the planning period, the City anticipates that 5,758 new homes will be constructed. All 5,758 are counted toward the City's above-moderate RHNA.

Although a village in itself, the Sanctuary consists of four smaller villages, each featuring pedestrian-friendly tree-lined streets, small neighborhood greens, and convenient access to the Sanctuary's other land uses through an interconnected street system, sidewalks, and a public pathway system. These villages, known as the Village Center, the Marina Village, the Great Park Village and the Lake Village are central to the civic, social, and residential heart of the community. Residential uses will have various densities throughout the site, meeting the needs of a variety of residents. The Sanctuary plan includes traditional market rate, age restricted, gated communities, and mixed-use buildings and will include both for-sale and rental properties. The Sanctuary Master Development Plan includes a wide range of housing types, sizes, and arrangements, including garden apartments, condominiums, or flats (all with the option of being for sale or for rent).

Development of the Sanctuary site will likely consist of four phases expected to be implemented over a number of years according to the housing market. The infrastructure will be developed as required by the City of Stockton. Some infrastructure, such as backbone transportation improvements (bridges, etc.), will need to be complete prior to adjacent development. In order to proceed to the next phase, the prior phase must have completed at least 50 percent or more of the final mapping for that phase, and at least 50 percent or more of the requisite off-site infrastructure shall be either in place or bonded for. The requisite infrastructure for the commercial and industrial land uses shall be built in equal proportions to the residential land uses developed.

The developer's civil engineering firm has prepared lotting studies, circulation exhibits, grading studies, and general civil engineering assessments. Plans are underway for levee design and permitting. Additional levee analysis and improvement are needed prior to off-site infrastructure (utilities, roads) work can begin. Future submittals for residential uses include ministerial design review for the residential units (master plan homes and apartments), improvements plan for the grading, and recordation of the final map. While apartment complexes are allowed by right and only require ministerial review, should the applicant request condominiums, a subdivision map would need approval before the recordation of the new condominium lots.

SONORA SQUARE APARTMENTS

The Sonora Square Apartments project is a partnership with San Joaquin Behavioral Health Services (SJCBHS) and the HACSJ to provide 37 affordable, permanent supportive housing units for individuals who are experiencing homelessness, chronic homelessness, are at risk of chronic homelessness, and who are in need of mental health services. HACSJ and SJCBHS were awarded Low-Income Housing Tax Credits, nearly $2.1 million in noncompetitive No Place Like Home funds, $4.6 million through the Mental Health Services Act, and $456,000 in CDBG funds from the City of Stockton. The HACSJ is providing project-based, housing choice voucher rental assistance for all units, and SJCBHS will provide supportive services to residents. The 37 one-bedroom units will be 600 square feet each. The ministerial design review of the project was approved. As of February 2023, construction was in process.

SWAIN CROSSING APARTMENTS

The Swain Crossing Apartments project includes four 3-story buildings and a total of 36 apartment units, 63 parking spaces, landscaping, and site improvements. The project is requesting an administrative exception for a reduction in the front-yard setback from 15 feet to a

minimum of 12 feet. As of January 2023, this project was in the process of design and site plan review and the administrative exception application.

Future submittals for residential uses include improvements plan for the grading and building permits for unit construction. No other approvals are needed from the City. Of the 36 homes, it is anticipated that 5 will be affordable to above moderate-income households, and 31 will be affordable to moderate-income households. The applicant could request a ministerial affordable housing agreement with the City to convert some of the market-rate units to affordable in the future to help secure funding.

TRA VIGNE

The Tra Vigne project is facilitated by a general plan amendment, annexation prezoning, and vesting tentative maps for the project's two subset areas of development, Tra Vigne East and Tra Vigne West. Of the 341.17 total acres comprising the approved project, 318.05 acres are available for residential development. The remaining acreage are reserved for detention basins. The project will include new residences, 101,500 square feet of commercial uses, up to 20.36 acres of nontraditional park area, and up to 15.07 acres of traditional park area. Additionally, the project would establish a 14.7-acre K-8 school site to be developed by the Lodi Unified School District. During the planning period, the City anticipates that 1,503 new homes will be constructed in both subdivision maps. On February 17, 2021, annexation was approved and the vesting tentative map became effective. As of February 2023, one map extension has been approved by the Planning Commission, and the project now has an expiration date of February 17, 2024. Two more can be granted per the City's municipal code.

The first stages of development would be in Tra Vigne West along the southwest portion of the project site along West Lane and then generally toward the east and north in up to 12 separate phases. Tra Vigne East is anticipated to be developed following Tra Vigne West, in up to four separate phases. The project applicants have stated to City staff that they will build single-family homes on large and small lots.

All 1,503 dwelling units are counted toward the City's above-moderate RHNA and are expected to be constructed during the planning period.

TRINITY PARKWAY APARTMENTS

The Trinity Parkway Apartments project includes 120 apartment units. As of January 2023, this project was in the process of design and site plan review, administrative determination, exceptions, and land development applications. Of the 120 homes, it is anticipated that 102 will be affordable to above-moderate income households, and 18 will be affordable to moderate income households.

UNIVERSITY PARK

Per the executed development agreement, the University Park project will be a mixed-use development that includes a long-term educational center and a mix of commercial and residential development on approximately 103 acres. Existing historic buildings in the area will be retained. During the planning period, the City anticipates that 359 new homes will be constructed, affordable to above-moderate income households. In 2022, the applicant completed the construction of the 63,000-square-foot, 50-bed Stockton Rehabilitation Hospital, a small middle school, and Stockton Rehab Hospital. There is no remaining barrier for development. Future submittals for residential uses include ministerial design review for the residential units (master plan homes and apartments), improvements plan for the grading, and recordation of the final map. While apartment complexes are allowed by right and only require ministerial review, should the applicant request condominiums, a subdivision map would need approval prior to the recordation of the new condominium lots.

WESTLAKE AT SPANOS PARK

Per the executed development agreement, the Westlake at Spanos Park project is facilitated by a development agreement for the Westlake at Spanos West Master Development Plan. The Westlake at Spanos Park project will be built on approximately 690 acres of land that include the existing Paradise Point Marina (Paradise Marina), which is leased to a third-party operator and will be modernized or updated at a later time in accordance with the Master Development Plan. Of the

original 690 acres, a remaining 347.08 acres are available for residential development. During the planning period, the City anticipates that 2,621 new detached single-family homes will be constructed.

The Westlake Vesting Tentative Subdivision Map was approved by the City of Stockton Planning Commission on October 14, 2004, and the City of Stockton Community Development Director on January 13, 2005. The Westlake Final Map was approved by the City Council on January 31, 2006. The subdivision agreement was entered into by the City and original owner, as subdivider, on January 31, 2006, and amended in 2006, 2010, and 2014. The original owner and Spanos obtained permits and approvals from governmental or quasi-governmental agencies that also have jurisdiction over the project, including the Army Corps of Engineers and the California Department of Fish and Wildlife. In 2006, following execution of the subdivision agreement, original owner sold a portion of the property, which was subsequently developed. In 2014, the majority of the remaining land within Westlake was transferred from original owner to Stockton Westlake Investment LLC, a California limited liability company. Additional portions of the areas identified on the Westlake Final Map were subsequently developed. Numerous transportation improvements, landscaping and underground utilities, sewer and stormwater infrastructure, a lake and recreation area have been installed, with additional work ongoing as of February 2023. Phasing continues with lots being sold incrementally to developers, developed, and sold to individual homeowners. Land is reserved for public schools and a fire station. As of May 2023, 347.08 of the 690 acres remained and are anticipated to develop within the planning period.

In some of these areas, grading has commenced and there are imminent plans for adding underground utilities and paving streets. Lennar Homes intends to commence home construction and sales of "Villages A, B and K" in 2023. Construction of Lake 3 is complete, and two 72-inch connection pipes have been installed that will be connected to the lake in Crystal Bay at a future date. Improvement plans for the spine roads in the active adult villages will be submitted to the City in 2023.

There is no remaining barrier for development. Future submittals for residential uses include ministerial design review for the residential units (master plan homes and apartments), improvements plan for the grading, and recordation of the final map. While apartment complexes are allowed by right and only require ministerial review, should the applicant request condominiums, a subdivision map would need approval prior to the recordation of the new condominium lots.

VACANT SITES

The sites inventory contains 594 properties totaling 540.22 acres. As shown in **Table HE-54**, the total capacity of the vacant sites is 8,227 units (lower income: 4,577, moderate income: 2,932, and above moderate income: 718). Anticipated units are based on the realistic capacity assumptions described earlier. **Table A-1** in **Appendix A** provides parcel-level data on the sites. Maps of the pipeline projects and vacant sites are provided in **Appendix A**.

LARGE SITES WITH LOWER-INCOME UNIT CAPACITY

- Site 9-12: This site is 23.96 acres (18.96 acres used to calculate the unit yield), with RH zoning, outside of downtown, with a realistic capacity of 455 lower-income units. Five acres were omitted from the unit calculation to account for the anticipated extension of March Lane east from Holman Road to connect with SR99. This large HDR parcel was part of a larger single-family residential subdivision referred to as Blossom Ranch. The Blossom Ranch project area including the HDR parcel was annexed into the City in 1990. The first subdivision map was created in 1996 and established the HDR parcel and single-family lots around it. There has been previous interest from developers in developing the HDR parcel.
- Site 12-34: This site is 50.02 total acres with RH zoning, outside of downtown with a realistic capacity of 626 lower-income units. In 2023, the City approved a Tentative Parcel Map to initiate the process of splitting the parcel into 4 parcels and rezoning 2 of the 4 parcels. The 50.02-acre parcel is in the

process of becoming: 7.12 acres with CG zoning, 10.00 acres with RH zoning, 12.16 acres with RH zoning and 20.74 acres with RL zoning. Only the portions with CG and RH zoning are used to calculate anticipated unit yield, with realistic capacity modifiers of 44.6% on the CG portion and 80% on the RH portions.

- Site 12-35: This site is 19.35 acres with CL zoning, outside of downtown with a realistic capacity of 259 lower-income units.
- Site 12-36: This site is 12.90 acres with CL zoning, outside of downtown with a realistic capacity of 172 lower-income units.

The City has a strong track record of large sites developing with housing. The sites 12-34, 12-35 and 12-36 are in South Stockton, west of Interstate-5 and north of French Camp Rd. Immediately west of site 12-36 and close to site 12-35 is a recently built subdivision called Cornerstone. This project doesn't include affordable units. The developer informed the City that they are looking for additional land to continue to build housing. Several pipeline projects have large parcels that are anticipated to develop which further substantiates the assumption that these large sites will develop. **Table HE-53: Representative Projects** lists three projects on sites larger than 10 acres. These three projects have an average built density of 86 percent of the allowed density for each site:

- Eight Mile House Apartments, 13.5 acres, 384 units; developed at 95 percent of allowed density in the RM zone. This project doesn't include affordable units.
- Morada Crossings (Palms at Morada), 10.17 acres, 216 units; developed at 71 percent of allowed density in the RH zone. This project doesn't include affordable units.
- Sierra Vista Phase I and Phase II, 13.4 acres, 215 units, 100% affordable; developed at 93 percent of allowed density in the RH zone.

The City has included **Program 10. Large Site Development** to facilitate the development of these sites.

GOVERNMENT-OWNED SITES AND SITES WITH LOT CONSOLIDATION POTENTIAL

The land inventory includes sites that are owned by the City and sites that are owned by Stockton Unified School District (SUSD) ("Government-Owned"). The City has included **Program 10. Large Site Development** to facilitate the development of these sites. Additionally, there are several groups of sites that have strong potential for lot consolidation; some of these groups are government-owned and some are privately owned. The City will promote infill development with a variety of strategies including assisting with brownfield remediation, flexible development standards, planned infrastructure improvements, and streamlining the permitting process. The City will also actively work with local property owners and developers to assist in the consolidation and assembly of small infill parcels by processing lot mergers ministerially and offering incentives. The City has included Housing Element **Programs 8** and **9** which set forth the incentives and strategies to develop and address these sites.

Table A-1 in **Appendix A** provides parcel-level data on the sites, including identification of the consolidated groups and ownership. Additional details about these sites are provided herein.

Upcoming 2023 City of Stockton RFI/SOQ

The City is currently drafting a Request for Information/Statement of Qualifications (RFI/SOQ). All properties in the RFI/SOQ will be subject to the Surplus Lands Act (SLA). The SLA mandates that no fewer than fifteen percent (15 percent) of the units be reserved as affordable for lower-income households (80 percent AMI). Furthermore, all properties in this upcoming RFI/SOQ share the same estimated timeline:

- RFI/SOQ Issued: Q4 2023
- Entitlements: June 2025
- Building Permits: December 2025
- Construction Complete: June 2027

The following 5 sets of parcels (8 total parcels) are included in the upcoming 2023 RFI/SOQ:

- Sites 4-96, 4-97, and 4-230, totaling 0.34 acres, with a realistic capacity of 3 lower-income units and 9 above moderate-income units. These parcels are contiguous and make up part of the "Lafayette and Stanislaus Properties." The City will not require that contiguous parcels be developed as one project. However, depending on the interest received and the scale of the project, the City will facilitate a merger or lot line adjustment. If no interest is received for these 3 parcels, then the City will consider a merger.
- Site 4-33: This site is 1.66 acres, with a realistic capacity of 17 lower-income units and 102 above moderate-income units. This is the other parcel associated with the "Lafayette and Stanislaus Properties" and is separated from the other three by an access drive. The collective "Lafayette and Stanislaus Properties" are integral to a draft Neighborhood Action Plan for the Little Manila / Gleason Park neighborhood, which is part of the Shape Stockton planning effort happening concurrent with the Housing Element Update.
- Sites 4-231 and 4-232: This site totals 0.52 acres, and a realistic total capacity of 1 lower-income unit and 5 above moderate-income units. These two contiguous parcels constitute the "Airport Way and Folsom Street Properties." Similar to the "Lafayette and Stanislaus Properties," the City does not mandate the development of these contiguous parcels as a single project. However, contingent upon the level of interest received and the project's scale, the City will facilitate a merger or lot line adjustment. In the absence of expressed interest for these two parcels, the City will contemplate a merger or lot line adjustment for the "Airport Way and Folsom Street Properties" as well.
- Site 3-74: This site is 0.4 acres, with a realistic total capacity of 1 lower-income unit and 1 above moderate-income unit. This parcel is referred to as the "Lafayette Street Property".
- Site 4-183: This site is 0.33 acres with a realistic capacity of 1 lower-income unit and 3 above moderate-income units. This parcel is referred to as the "Airport Way and 8th Street Property".

Collectively, these sites have a realistic capacity of 23 lower-income units and 120 above moderate-income units for a total of 143 units. Other Government Owned Sites in this category include 21 parcels owned by SUSD, and 6 parcels owned by the City.

- Sites 1-1 through 1-17 and 1-39 through 1-42: This site consists of 21 parcels, totaling 3.7 acres. All parcels are owned by SUSD. The site is bounded by W Market Street to the north, S Lincoln Street to the west, W Washington Street to the south and S Madison Street to the east. All parcels are contiguous except where divided by S Van Buren and S Monroe Streets. As described in Program 9, the City is committed to continuing to coordinate with SDSU on development plans for these parcels. If a plan for housing development on these parcels is not underway by 2026, the City will determine whether additional sites for housing must be identified, and identify them accordingly, as needed.
- Sites 1-18 through 1-21: This site is known as South Pointe and consists of 4 parcels, totaling 9.1 acres. The City issued an RFP for this site on June 25, 2020. The RFP called for a total of 520 units, with no fewer than 15 percent of the total units reserved as affordable for lower-income households, since the site is subject to the SLA. The development will include market rate, workforce, independent senior living, and affordable units, up to 16,000 square feet of commercial retail space, up to 4,000 square feet of space dedicated to educational uses, and ancillary site improvements such as parking and landscape areas. The RBH Group was awarded an Exclusive Negotiating Rights Agreement for the site by City Council in December 2020, however, a Development and Disposition Agreement is still in development. The project has received a grant to assist with the necessary site remediation. The anticipated development is considered a permitted use in the CD zone. However, because the site is within the

Channel Area District Overlay, a use permit from the Planning Commission is required. Subsequent to approval by the Commission, a ministerial permit approval would be required for the review of building design and compliance with site development standards prior to project development. Future development would require a grading permit to remove contaminated soil, which would occur prior to construction. A lot merger for the parcels that make up the site may also be required to prevent construction across property lines. However, no lot merger is proposed at this time. As described in the RFP, the project will be completed in 2 phases. Since the anticipated completion date for phase 2 is beyond the duration of the 6th cycle, its units are not counted towards the City's RHNA in this inventory. The anticipated timeline is:

- Phase 1: 300 units (45 lower-income and 255 above moderate-income)
  - Entitlements: October 2024
  - Building Permits: May 2025
  - Construction Complete: July 2027
- Phase 2: 220 units (33 lower-income and 187 above moderate-income)
  - Entitlements: June 2031
  - Building Permits: January 2032
  - Construction Complete: March 2034

- Site 4-67: This site is 0.46 acres with a realistic total capacity of 18 above moderate-income units. This site is part of a larger area that was recently zoned for mixed-use. The City will assess the suitability of declaring this site surplus based on potential interest in developing the site with a mixed-use development. As stated in Program 9, If a plan for housing development on this parcel is not underway by 2026, with building permits issued by June 2029 the City will determine whether additional sites for housing must be identified, and identify them accordingly, as needed, including rezoning sites to address the RHNA if needed. The site is landlocked by the railroad and a privately owned parcel and will need remediation prior to development. If the City declares the site surplus, it will be subject to the SLA and will have the following estimated schedule:
  - RFI/SOQ Issued: Anticipated Q2 2025
  - Entitlements: June 2026
  - Building Permits: December 2026
  - Construction Complete: June 2028
- Site 4-210: This site is 2.73 acres with a realistic total capacity of 19 above moderate-income units. The City will assess the suitability of declaring this site surplus based on potential interest in developing the site with a residential development. As stated in Program 9, If a plan for housing development on this parcel is not underway by 2026, with building permits issued by June 2029 the City will determine whether additional sites for housing must be identified, and identify them accordingly, as needed, including rezoning sites to address the RHNA if needed. It is adjacent to a drainage area from a developed subdivision and contiguous with 2 vacant sites in the inventory under private ownership (4-158 and 4-159). If the City declares the site surplus, it will be subject to the SLA and will have the following estimated schedule:
  - RFI/SOQ Issued: Anticipated Q2 2025
  - Entitlements: June 2026
  - Building Permits: December 2026
  - Construction Complete: June 2028

Privately-Owned Sites with Lot Consolidation Potential

Lastly, privately owned sites with potential for lot consolidation are detailed herein. As described above, Programs 7 and 8 set forth the incentives and strategies to develop and address these sites.

- Sites 4-15 through 4-26: These sites are composed of 12 parcels, totaling 1.61 acres, with a realistic capacity of 60 moderate-income units. This site area forms an entire block and is outlined by W. Lafayette Street, S. Center Street, W. Sonora Street, and S. Commerce Street consisting of 12 vacant parcels. Eight of these parcels are under common ownership, while the remaining 4 are owned by 4 individual owners. The collectively owned parcels share some adjacencies, with the others interspersed,

forming a patchwork. While the entire block is included and totals 1.61 acres, each parcel is smaller than a half-acre. The anticipated units are counted towards the moderate-income RHNA. Each site can develop independently, possessing street frontage.

- Sites 4-27 through 4-30: This site is 4 parcels, totaling 0.94 acres, with a realistic capacity of 11 low-income units. However, no units are counted towards the City's RHNA on these parcels. These 4 contiguous parcels are under common ownership. Formerly the 4 parcels were owned by 2 entities (each owned 2 of the parcels) and as of recently the same owner owns all 4, indicating the owner is interested in developing the 4 parcels together. The sites are vacant except for a very small area of remnant concrete from a former use. The concrete is severely broken and full of weeds. There are no active uses on the sites.
- Sites 3-1 through 3-3: This site is 3 parcels, totaling 6.4 acres, with a realistic capacity of 84 low-income units. However, no units are counted towards the City's RHNA on these parcels. These are contiguous vacant parcels and under common ownership.
- Sites 3-4 and 3-5: This site is two parcels totaling 0.41 acres, with a realistic capacity of 16 moderate-income units. The 2 parcels are under common ownership and adjacent to each other.
- Sites 4-1 through 4-14: This site is 14 parcels, totaling 2.01 acres, with a realistic capacity of 74 low-income units. However, no units are counted towards the City's RHNA on these parcels. This site consists of an entire block bounded by W. Sonora Street, S. Lincoln Street, W. Church Street, and S. Harrison Street All parcels are owned by St. Mary's Community Services. This organization provides various community services, including hot meals, a day center, health services, emergency shelter, and housing services. As of April 2024, an emergency shelter project was entitled on this site.

ACCESSORY DWELLING UNIT POTENTIAL

California Government Code Section 65583.1(a) states that a town, city, or county may identify sites for ADUs based on: the number of ADUs developed in the prior housing element planning period, the need for ADUs in the community, the resources or incentives available for their development, and any other relevant factors. Based on recent changes in state law reducing the time to review and approve ADU applications, requiring ADUs that meet requirements to be allowed by right, eliminating discretionary review for most ADUs, and removing other restrictions on ADUs, it is anticipated that the production of ADUs will increase in the 6th-cycle housing element planning period.

The City issued building permits for 4 ADUs in 2018, 4 in 2019, 16 in 2020, 29 in 2021 and 60 in 2022, showing a growth pattern over the last five years. This analysis assumes that the number of ADU applications and permits will average 22.60 ADUs per year, for a total of 180 ADUs during the planning period. Data from 2023 supports these assumptions. The City permitted 10 ADUs between July 23, 2023, and October 16, 2023.

While Stockton is not in the ABAG region, ABAG's 2021 regional analysis of existing ADU rents is a useful starting point for affordability assumptions because there is not the same type of study from the San Joaquin region. The ABAG analysis resulted in affordability assumptions that allocate 30 percent of ADUs to very low-income households, 30 percent to low-income households, 30 percent to moderate-income households, and 10 percent to above-moderate-income households. Next, the following local affordability analysis was considered:

- Based on the 2022 AMI for San Joaquin County:
  - A low-income household of three could afford a monthly rent of $1,490.
  - A low-income household of two could afford a monthly rent of $1,325.
  - A low-income household of one could afford a monthly rent of $1,159.

- Based on a survey of listings for rentals in Stockton on Zillow.com in October 2022, the average monthly rents were $1,183 for a studio, $1,338 for a 1-bedroom, and $1,615 for a two-bedroom.

A slightly more conservative approach is taken here than in ABAG. Instead of assuming that 30 percent of the ADUs will be affordable to very low-income households and 30 percent will be affordable to low-income households, as shown in **Table HE-54**, Stockton is counting 60 percent of its anticipated ADUs in the low-income category. This is supported by the local affordability analysis above. The remaining 40 percent are allocated as 30 percent to the moderate-income category and 10 to the above moderate-income category, which is identical to ABAG's approach.

As shown in **Table HE-54**, of the 180 ADUs projected to be built, it is estimated that 108 will be for low-income households, 54 will be for moderate-income households, and 18 for above-moderate-income households.

HAZARDS AND OTHER POTENTIAL SITE CONSTRAINTS

The safety element addresses the topic of public health and safety following state requirements in Section 65302(g) of the California Government Code. State law requires that the safety element contain background information and goals and policies to address multiple natural hazards, analyze the vulnerabilities from climate change, contain policies to improve climate change resilience, and assess residential areas with evacuation constraints. The Housing Element sites inventory was screened for several hazards. The potential presence of these natural hazards is identified herein. The presence of any hazard does not automatically preclude development. Refer to the Safety Element for mitigation measures. Other than those conditions described herein, there are no other known environmental constraints or conditions within the City that could preclude development on identified sites within the planning period, including hazards, airport compatibility and related land use controls, shape, contamination, easements or overlays.

CONTAMINATION

Based on the CalEPA Cortese List Data Resources site, three contaminated sites with open cases are located in Stockton. These sites are not identified in the Housing Element as potential residential development sites, and they do not pose a constraint for the housing sites. Stockton has no sites with cease-and-desist orders or cleanup and abatement orders from the California Water Board. When site remediation is needed, the City coordinates with owners to facilitate remediation and development.

AIRPORT COMPATIBILITY

Aircraft operations (-AIR) overlay district, Stockton Municipal Code Chapter 16.28.030 provides height limits for structures in the vicinity of the Stockton Metropolitan Airport. This zone does not limit development of anticipated units on the sites in the Housing Element sites inventory.

LIQUEFICATION

Liquefication is a phenomenon in which the strength and stiffness of a soil is reduced by earthquake shaking or other rapid loading. It is loose, water-saturated sediments that lose durability and fail during strong ground shaking. No sites in the inventory are at risk for liquefaction.

LANDSLIDE SUSCEPTIBILITY

Landslides are the movement of a mass of rock, debris, or earth down a slope and are induced by strong earthquakes or heavy rain. The California Geological Survey Map relies on regional estimates of rock strength and steepness of slopes since weak rocks and steep slopes are most likely to generate landslides. The California Geological Survey classifies susceptibility on a scale from 0 to 10, low to high. No sites in the inventory are at risk for landslides.

FIRE HAZARD SEVERITY

The California Department of Forestry and Fire Protection assess fire hazard severity based on fuel loading (vegetation), fire weather (winds, temperatures, humidity levels, and fuel moisture contents), and

topography (degree of slope). No sites in the inventory are at risk for wildfire.

FLOODING

Flooding is the rising and overflowing of a body of water onto normally dry land. Floodplains are any land area subject to inundation by floodwaters of any source. As described in the City's Safety Element, historically, floods are one of the most frequent natural hazards impacting communities in San Joaquin County, including Stockton and can be very dangerous. As such, the Safety Element describes the range of mitigation measures and responses to flooding risk that the City continues to implement. A majority of the flood risk within Stockton is specifically subject to inundation as a result of heavy rainfall and resulting stream and drainage canal overflows.

The map used to screen the sites for flood hazards is the Best Available Map (BAM) developed by the Department of Water Resources (DWR). It displays potential exposure to flooding for three different storm events: one with storm flows that have a 1- percent chance of being equaled or exceeded in any year (100-year), one with storm flows that have a 0.5- percent chance of being equaled or exceeded in any year (200-year), and one with storms flows that have a 0.2-percent chance of being equaled or exceeded in any year (500-year).

According to the BAM, no sites were identified to be in a DWR 100-year Flood Zone; however, of the 614 properties in the inventory, the following was identified:

- 64 properties are in a Federal Emergency Management Agency (FEMA) 100-year Flood Zone
- 34 properties are in a U.S. Army Corps of Engineers (USACE) 200-year Flood Zone
- 542 properties are in a FEMA 500-year Flood Zone
- 537 properties are in a California Division of Safety of Dams (DSOD) Dam Inundation Area

See **Table A-1** in **Appendix A** for the affected parcels. Similar conditions have not precluded the development of other similar sites with residential units

ADEQUACY OF PUBLIC FACILITIES AND INFRASTRUCTURE

State law requires local governments to provide a copy of the adopted housing element to all water and sewer providers. In addition, water and sewer providers must grant priority for service allocations to developments that include units affordable to lower-income households. The City of Stockton will comply with SB 1087, as described in **Program 13. Priority Sewer and Water Service for Affordable Housing.**

This section addresses the adequacy of public facilities, services, and infrastructure to accommodate planned residential growth through the end of the Housing Element planning period. The following information regarding the adequacy of public facilities and infrastructure is based largely on information from the 2020 City of Stockton Municipal Service Review (MSR) and 2040 General Plan Environmental Impact Report (EIR).

WATER

Water systems in the Stockton Metropolitan Area use a combination of treated surface water provided by the Stockton East Water District and pumped groundwater to supply water in the city. Stockton water purveyors include the City of Stockton Municipal Utilities Department, California Water Service Company, and San Joaquin County Maintenance Districts.

Stockton has met and expects to be able to continue to meet annual water demands in the city during differing hydrologic periods with surface water, groundwater, water conservation, and other potential water supplies, such as nonpotable supplies from local communities, raw surface water from local irrigation districts, and water from active groundwater storage projects. The City's 2035 General Plan commits the City to maintaining existing facilities and developing new water treatment and delivery facilities. The General Plan includes policies that ensure and require that adequate water supplies and facilities are located and maintained throughout the urbanized areas of the city to meet future growth. In addition, any costs associated with new facilities and/or upgrades to existing facilities will be

offset through the increased revenue and fees generated by future development. The City will review future projects on an individual basis and will require compliance with City requirements (e.g., impact fees) in effect at the time building permits are issued.

SEWER

The City's wastewater collection and treatment facilities consist of the Stockton Regional Wastewater Control Facility (RWCF) and the City of Stockton Wastewater Collection System Facilities. The RWCF provides primary, secondary, and tertiary treatment of municipal wastewater from throughout the city. According to the City's 2020 Municipal Service Review, the RWCF has a permitted dry weather flow capacity of 55 million gallons per day.

The City's sanitary sewer collection system is divided into 10 designated subareas or "systems". Pump stations are located throughout the city and are integral to the wastewater collection system. Most of the pump stations discharge to pressure sewers that convey flow under pressure either directly to the RWCF or to a downstream gravity sewer.

The Stockton Wastewater Control Facility provides primary, secondary, and tertiary treatment of municipal wastewater from throughout the city. The RWCF is north of SR-4 on both sides of the San Joaquin River. The Main Plant located on the east side of the rover provides screening, grit removal, raw sewage pumping, primary sedimentation with chemical addition, secondary treatment with aeration basins, secondary clarification, and secondary effluent pumping. The Tertiary Plant includes dual-media tertiary filtration to meet Title 22 requirements, disinfection by chlorination using a chlorine contact channel, and dichlorination before discharging to the San Joaquin River.

The current treatment facilities will remain in service until the tertiary treatment facilities including the outfall structure are relocated to the Main Plant located on the east side of the river. Compliance date with the current NPDES permit is June 1, 2024. Phasing and timing of additional facilities to accommodate additional growth are discussed in the 2022 Capital Improvement and Energy Management Plan.

INFRASTRUCTURE FINANCING

The City of Stockton 2040 General Plan requires new development to pay its fair share of the costs of public facilities and utilities needed to support additional growth. Stockton receives funds for the provision of public services through State sources, development fees, property taxes, and connection and usage fees. The City reviews its fee structures on an annual basis to ensure that they provide adequate funding to cover the provision of City services. The City's standard condition of development requires preparation of a capital improvement program for specific plans and master plans. The City charges public utility fees per dwelling unit for residential uses. Because the City and other service agencies have adequate fee structures and planning processes, described above, to ensure that the fees remain sufficient to cover costs of required services, no financial constraints to service provision have been identified. The City's policy ensures it will continue its efforts to maintain funding of existing and future public facilities and services.

The City has also received funding for capital improvement projects from the Community Development Block Grant (CDBG) program. The City receives subventions from the State of California, such as gas tax revenues, which are used for infrastructure projects, and has also benefited from one-time special allocations from the State for law enforcement and parks capital improvement projects. The City has also been successful in applying for a variety of infrastructure related grants.

The 2020 City of Stockton MSR found the water and sewer capacity adequate to meet current and future demands within the city limits. The City has adequate water and sewer capacity to serve the sites used to meet the City's RHNA. Future development outside the existing city limits within the sphere of influence boundary will require the development of new facilities. To adequately meet future demands, new residential developments are required to pay for the major capital improvements to water and sewer infrastructure needed to serve future residents.

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EXISTING HOUSING PROGRAMS AND FINANCIAL RESOURCES 5

INTRODUCTION

This section provides information on local housing programs as well as local, State, and federal financial resources that are available to support the City of Stockton's housing programs. Because of the high cost of new construction, more than one source of public funds is often required to construct an affordable housing development. The City of Stockton partners with the private sector to develop new units with the assistance of these various funding sources. The City also uses funds to support housing rehabilitation and preservation of the city's older neighborhoods, assist first-time homebuyers, and provide various other housing services to lower-income households.

LOCAL HOUSING PROGRAMS

CITY OF STOCKTON

The Housing Division of the City of Stockton Economic Development Department works closely with other agencies to facilitate the production and preservation of affordable housing, assist in the development of suitable living environments, and expand economic opportunities to low-income families by providing them with financial assistance loans.

Single Family Housing Repair Loan Program

The Single-Family Housing Repair Loan program provides financial assistance to low-income homeowners for home repairs. Funding for the loan program comes from CDBG, HOME, and CalHome. The program aims to bring local housing into compliance with California Building Code standards and improve accessibility for homeowners. The program guidelines are:

- **Eligibility:** Low-income (80 percent AMI or lower), within city limits, owner-occupied single-family or two units on one lot with one of the units occupied by the eligible owner.
- **Loan Term:** 30 years, deferred.
- **Loan Interest Rate:** 1 percent simple interest.
- **Other:** The owner's debt ratio may not exceed 55 percent; the property loan-to-value ratio (after repair) may not surpass 105 percent.

Emergency Housing Repair Program

The Emergency Housing Repair Program provides up to $30,000 in one-time funding for the correction of code violations from the City, fire marshal, or health officers to low-income property owners. Funds are available on a case-by-case basis from CalHome and CDBG funds. The following are the program guidelines:

- **Eligibility:** Low-income (80 percent AMI), owner-occupied, property within city limits.
- **Loan Term:** 30 years; loan forgiven after 7 years if the borrower does not sell or transfer ownership; for senior households (60 years and over) the loan is forgivable.
- **Loan Interest Rate:** Zero percent, deferred.
- **Other:** Property loan-to-value ratio (after repair) may not surpass 105 percent.

Down Payment Assistance Program

The Down Payment Assistance Program uses funds from NSP, CalHome, and HOME. The goal is to increase the homeownership rate by helping to lessen the burden of a down payment and closing costs for low-income residents. The program lends up to $10,000 in assistance (or 5 percent of the purchase price plus the closing costs) to purchase of the home, plus accessibility repairs to residences for handicapped persons. The funds are loaned for 30 years with a simple interest rate of 3 percent for the first 15 years and zero interest for remaining 15 years.

- **Eligibility:** Low-income (80 percent AMI), first-time homebuyers, must reside or be employed in the city for 12 months before applying.
- **Loan Term:** 30 years; deferred; amount of up to $10,000 or 5 percent of purchase price, plus closing costs.
- **Loan Interest Rate:** 3 percent for first 15 years and zero percent for remaining 15 years; at end of 30-year period owe entire amount of loan and a "balloon payment" of 5 percent of the home's net appreciation.
- **Other:** Borrowers are required to attend a home-buyer class from a City-approved provider.

Multifamily Projects

The City provides funds for acquisition and predevelopment costs and for the cost of building or renovating multifamily units. Funding comes from HOME and CDBG. The following are the program guidelines:

- **Eligibility:** Funds are awarded through NOFA process and are project specific.
- **Loan Term:** Variable based on project.
- **Loan Interest Rate:** Variable based on project.

Fee Waivers and Reductions

Residential fee waivers/reductions are via the Greater Downtown Stockton Residential Development Public Facilities Fees Exemption Program and Stockton Economic Stimulus Plan (SESP).

Stockton Economic Stimulus Plan

The SESP program provides a Public Facility Fees (PFF) fee reduction for qualifying single-family residential, multifamily residential, commercial, and industrial projects in Stockton.

PFF reduction amounts to the categories above are as follows:

- Up to a total of $19,997 or 100 percent (whichever is less) for single-family residential.
- $14,080 per unit for multifamily residential.
- 50 percent reduction for commercial and industrial.

Fee reductions are applied to the following PFF fee categories:

PFF CATEGORY	RESIDENTIAL	COMMERCIAL/ INDUSTRIAL
City Office Space	✓	✓
Libraries	✓	✓
Fire Stations	✓	✓
Parkland	✓	
Community	✓	✓
Recreation Centers	✓	✓
Police Stations	✓	✓
Street Improvements	✓	✓

The fee reduction applies to single-family residential, multifamily residential, and nonresidential (commercial/industrial) permits issued citywide for builders/developers who comply with the terms of the program.

To participate in the single-family residential component of SESP, a developer must comply with the local hire and disadvantaged individual requirements. Only units within the existing city limits are eligible to meet the local hire requirement of the program. The commercial/industrial component, formerly the Public Facilities Fee Reduction Program (established in 2010), was folded into the SESP program in 2015; reporting of local hiring is not a requirement.

Greater Downtown Stockton Residential Development Public Facilities Fees Exemption Program

A related program the Greater Downtown Stockton Residential Development Public Facilities Fees Exemption Program, provides a waiver for certain PFFs for all new residential development within the Greater Downtown Stockton area.

Downtown Infill Infrastructure Program

The Downtown Infill Infrastructure Program provides a financial incentive to eligible parties interested in developing new market-rate residential, commercial, or mixed-use projects in downtown Stockton. In Stockton's downtown area, aging infrastructure, such as sewer and water lines, and the rehabilitation of older structures can significantly increase project costs and serve as barriers to infill development.

Under the Downtown Infill Infrastructure Program, eligible development projects may receive a reimbursement for certain public infrastructure improvements. Examples of eligible public infrastructure improvements include sewer and water; storm drain; street improvements, including crosswalks, bike lanes, striping, and medians; traffic signals; streetlights; and landscaping.

To qualify for the program, the developer must meet these criteria:

1. Develop a minimum of 35 new market-rate residential units and/or develop a minimum of 30,000 square feet of new or newly renovated retail or commercial space.
2. Be within the program boundary, which includes Center Street to the west, Park Street to the north, ACE Rail/Union Pacific Railroad to the east, and Washington Street to the south.
3. Make a capital investment of at least $500,000.
4. Eligible public infrastructure improvements must equal $100,000 or more.

Applicants must submit a request for funding to the Economic Development Department for review and consideration. If deemed eligible under the program guidelines, a Reimbursement Agreement requiring Council approval will be executed between the City and applicant. The City will reimburse the applicant within six months of completion of the public improvements in the reimbursement agreement, up to $900,000 annually. The program was approved by Council on July 7, 2015, and is scheduled to sunset in July 2025.

Neighborhood Services: Code Enforcement

The Neighborhood Services Section of the Stockton Police Department enforces codes, laws, and regulations for the abatement of substandard housing conditions and zoning violations; blight issues; and the abatement of abandoned, dismantled, or inoperative vehicles.

Since 2004, code enforcement has become a more important facet of the City's operations. Many of the problems the City faced in the past have become more manageable because of public awareness and understanding of what can be done to fix the problems. Additional resources and programs have also been made available to aid rehabilitation and renovation.

Stockton Code Enforcement operates primarily on a complaint basis. Once a code enforcement officer (CEO) verifies a complaint, a Violation Warning Notice is prepared and posted on the property and sent in the mail to the occupant and property owner (if different). The Violation Warning Notice notes the violations found and gives a deadline for correcting the violations. If the occupant/owner does not comply, various administrative tools are available, including fees, fines, abatement, and civil penalties. The CEOs make every

effort to work with property owners and tenants and assist whenever possible. The response to the City's approach and case processing procedures has been positive. Approximately 30 percent of cases are closed after the first Violation Warning Notice, and the number of administrative fines has declined in the past few years.

The most common housing violations are deferred maintenance issues like plumbing leaks, worn/deteriorated materials, and lack of weather protection. Others include structural problems, raw sewage, exposed wiring, and other exterior housing problems. The majority of housing cases usually take a minimum of 45 days to resolve, depending on the amount and severity of the violations. The potential contributors to code violations include the volume of rental housing and the structural age of many buildings in the city. The majority of the violations involve multifamily dwellings. Rental property owners, especially those not in the area, find it difficult to maintain their properties and monitor their tenants on a regular basis. In the downtown and midtown areas, many of the buildings are among the first built when Stockton became a city in 1851. Although they have been maintained to some extent, many have serious structural problems that are difficult and costly to fix.

FORMER STOCKTON REDEVELOPMENT AGENCY

California law eliminated redevelopment agencies throughout the state in February 2012. The law, Assembly Bill X1 26, required the establishment of successor agencies to take over the remaining vestiges of redevelopment. Additionally, in June 2012 Governor Brown signed Assembly Bill 1484 (AB 1484). One of the key components of AB 1484 was the requirement that all successor agencies develop a long-range property management plan that governs the disposition and use of former nonhousing redevelopment agency properties. In August 2011 the City of Stockton passed a resolution stating it would serve as the successor agency to the Stockton Redevelopment Agency and the City would assume the redevelopment agency's housing functions. In April 2012 the City established the Stockton Successor Agency Oversight Board to direct and approve functions of the successor agency. As the successor agency, the City oversees bond proceeds of the former redevelopment agency.

HOUSING AUTHORITY OF SAN JOAQUIN COUNTY

The Housing Authority of San Joaquin County has several programs to assist low- and moderate-income households with housing costs, including the Housing Choice Vouchers Program, public housing, and migrant farmworker housing. The Public Housing Program provides rental assistance at four main sites (two in Stockton, one in Tracy, and one in Thornton). Through the Migrant Program the Housing Authority manages two migrant farm labor housing developments in unincorporated areas of the county. In addition, the San Joaquin Housing Authority provides the Family Self-Sufficiency Program, supportive services centers, and the Resident Construction Program.

Housing Choice Vouchers Program

The San Joaquin Housing Authority manages the Housing Choice Vouchers Program (Section 8) for all of San Joaquin County. The program offers a voucher that pays the difference between the current fair market rent and what a tenant can afford to pay (e.g., 30 percent of their income). The voucher allows a tenant to choose housing that may cost above the payment standard, but the tenant must pay the extra cost. As of 2022, 3,639 households in Stockton received rental assistance through the Housing Choice Vouchers Program.

Public Housing

The San Joaquin Housing Authority provides public housing at the four main locations shown in **Table HE-54**. Two of the housing developments are in Stockton—Conway Homes and Sierra Vista Homes. Both developments provide single-family homes at rents affordable to low-income households. In addition, the Authority owns and manages four market-rate properties: West Park Street Apartments, Washington Avenue Apartments, Mourfield Avenue Apartments, and Claremont Manor Apartments.

Table HE-54: San Joaquin Housing Authority Public Housing

San Joaquin County, 2023

NAME OF DEVELOPMENT	ADDRESS	DESCRIPTION
Conway Homes	741 S. Flint Avenue Stockton, CA.	436 single- family dwelling units ranging from 1 to 5 bedrooms
Sierra Vista Homes	2436 S. Belleview Street Stockton, CA	391 single- family dwelling units ranging from 1 to 5 bedroom units
Tracy Homes	340 W. Fourth Street Tracy, CA	195 single- family dwelling units ranging from 1 to 5 bedrooms
Mokelumne Manor	26188 N. Manor Drive Thornton, CA	50 single-story duplexes ranging from 1 to 4 bedrooms, each equipped with a private backyard

Source: San Joaquin Housing Authority, October 2022.

Federal and State Funding

Table HE-55 lists federal and state funding sources that the City could apply for by itself or with partners.

Table HE-55: Financial Resources for Housing Activities

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
Federal Programs		
Community Development Block Grant (CDBG)	*Grants available to the County on a competitive basis for a variety of housing and community development activities. County competes for funds through the State's application process.*	*- Acquisition - Rehabilitation - Home Buyer Assistance - Economic Development - Homeless Assistance - Public Services*
Housing Choice Voucher Program (Section 8)	*Assistance program that provides direct funding for rental subsidies for very low-income families.*	*- Rental Assistance*
Home Investment Partnership Program (HOME)	*Grants available to the County on a competitive basis for a variety of housing activities. County competes for funds through the State's application process.*	*- Home Buyer Assistance - Rehabilitation - New Construction - Rental Assistance*
Section 202	*Grants to private nonprofit developers of supportive housing for very low-income seniors.*	*- New Construction*
Housing Rehabilitation Program	*Provides financial assistance to low-income homeowners for health and safety improvements.*	*- Rehabilitation*
Emergency Shelter Grants	*Competitive grants to help local governments and nonprofits finance emergency shelters, transitional housing, and other supportive services.*	*- New Construction - Rehabilitation - Homeless Assistance - Public Services*
Continuum of Care/Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH)	*Funding through the HEARTH Act of 2009 to provide necessary resources for development of programs to assist homeless individuals and families.*	*- Homeless Assistance - New Construction*
Housing Opportunities for Persons with AIDS (HOPWA)	*The HOPWA program provides housing assistance and supportive services for low-income people with HIV/AIDS and their families.*	*- Rental Assistance*
State Programs		
Local Housing Trust Fund Matching Grant Program	*Provides matching grants to local housing trust funds that are funded on an ongoing basis from private contributions or public sources that are not otherwise restricted in use for housing programs.*	*- New Construction - Homebuyer Assistance*

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
Single-Family Housing Bond Program (Mortgage Revenue Bonds)	*Bonds issued to local lenders and developers so that below-market interest rate loans can be issued to first-time homebuyers.*	*- Homebuyer Assistance*
Mortgage Credit Certificates (MCC)	*Provides qualified first-time homebuyers with a federal income tax credit that reduces the borrower's federal tax liability, providing additional income, which can be used for mortgage payments.*	*- Homebuyer Assistance*
Prop 63 Mental Health Services Act Funds	*Funding for capital improvements and operating subsidies for supportive housing for formerly homeless or at-risk individuals with mental disabilities.*	*- Special-Needs Programs* *- New Construction*
CalHome Program	*Grants awarded to jurisdictions for owner-occupied housing rehabilitation and first-time homebuyer assistance.*	*- Homebuyer Assistance* *- Rehabilitation*
Low-Income Housing Tax Credit (LIHTC)	*A 4 percent annual tax credit that helps owners of rental units develop affordable housing.*	*- Construction of Housing*
Affordable Housing Partnership Program (AHPP)	*Provides lower-interest-rate California Housing Finance Agency (CHFA) loans to homebuyers who receive local secondary financing.*	*- Homebuyer Assistance*
Permanent Local Housing Allocation (PLHA)	*PLHA provides a permanent source of funding for all local governments in California to help cities and counties implement plans to increase the affordable housing stock. The two types of assistance are: formula grants to entitlement and nonentitlement jurisdictions, and competitive grants to nonentitlement jurisdictions.*	*- Predevelopment* *- Development* *- Acquisition* *- Rehabilitation* *- Preservation* *- Matching Funds* *- Homelessness Assistance* *- Accessibility Modifications* *- Homeownership Assistance* *- Fiscal Incentives*
Local Early Action Planning (LEAP) Grants	*The LEAP grants provide over-the-counter grants complemented with technical assistance to local governments for the preparation and adoption of planning documents and for process improvements that accelerate housing production.* *Facilitate compliance to implement the sixth-cycle Regional Housing Needs Assessment.*	*- Housing Element Updates* *- Updates to Zoning, Plans, or Procedures to Increase or Accelerate Housing Production* *- Preapproved Architectural and Site Plans* *- Establishing State-Defined Pro-housing Policies* *- See Complete List in Program Materials*
Senate Bill 2 Technical Assistance Grants	*Financial and technical assistance to local governments to update planning documents and the development code to streamline housing production, including, but not limited to, general plans, community plans, specific plans, implementation of sustainable communities' strategies, and local coastal programs.*	*- Technical Assistance* *- Planning Document Updates*
Housing and Disability Advocacy Program (HDAP)	*Services to assist disabled individuals who are experiencing homelessness apply for disability benefit programs while also providing housing assistance. HDAP has four core requirements: outreach, case management, disability advocacy, and housing assistance.*	*- Rental Assistance*

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
No Place Like Home	*Loans to counties or developers in counties for permanent supportive housing for those with mental illness who are homeless or at risk of homelessness.*	*- New Construction*
Homeless Emergency Aid Program (HEAP)	*A block grant program designed to provide direct assistance to cities, counties, and continuums of care to address the homelessness crisis throughout California.*	*- Identified Homelessness Needs* *- Capital Improvements Related to Homelessness* *- Rental Assistance*
California Emergency Solutions and Housing (CESH)	*Provides funds for activities to assist persons experiencing or at risk of homelessness. Program funds are granted in the form of five-year grants to eligible applicants.*	*- Homelessness Service System Administration* *- New Construction* *- Rental Assistance*

PRIVATE FUNDING

The Community Reinvestment Act of 1977 directs the Department of the Treasury, the Federal Reserve System, the Federal Deposit Insurance Corporation, and the Federal Home Loan Bank Board to encourage and assist the institutions they regulate to meet the credit needs of their communities. These agencies must assess the records of their member institutions when evaluating applications for a charter or other regulated transactions. As a result of this Act, many major financial institutions have elected to actively participate in funding low- and moderate-income housing developments developed by nonprofit corporations.

The Federal Home Loan Bank provides direct project financing through its member institutions as part of its Affordable Housing Program. The Savings Associations Mortgage Company, which is an organization of savings institutions, also provides financing for affordable housing developments. The California Community Reinvestment Corporation was formed to pool the resources of the state's banks to assist in financing affordable housing. Finally, the Federal National Mortgage Association (Fannie Mae) provides permanent financing for affordable housing development by purchasing or securitizing the lender-originated first mortgages on mutually agreeable terms.

ENERGY CONSERVATION OPPORTUNITIES

State housing element law requires an analysis of the opportunities for energy conservation in residential development. Energy efficiency has direct application to affordable housing because the more money spent on energy, the less available for rent or mortgage payments. High energy costs have particularly detrimental effects on low-income households that do not have enough income or cash reserves to absorb cost increases and many times must choose between basic needs such as shelter, food, and energy.

LOCAL ENERGY PROGRAMS

The City of Stockton provides a number of programs to encourage energy efficiency.

- **Property Assessed Clean Energy (PACE) Programs.** The City of Stockton provides a variety of programs for property owners to finance infrastructure improvements for renewable energy technology purchase and installation, energy and water efficiency improvements, and electric vehicle charging.
- **The Green-Up Stockton Ordinance.** The Stockton City Council adopted the Green-Up Stockton Ordinance (Ordinance 005-11 C.S.) in March 2011 to encourage voluntary residential energy efficiency assessments and retrofits for existing dwelling units. The goal of the ordinance is to provide energy retrofits to 8,500 homes, nearly 10 percent of Stockton's housing stock, and reduce energy consumption and greenhouse gas emissions by 25 percent for the retrofitted dwelling units.
- **Stockton Rising.** Stockton Rising is a City-led program aiming to improve the environment and climate resilience of neighborhoods most impacted by climate change. The City, along with 11 partners, is implementing projects that will directly benefit residents in South Stockton. Stockton Rising is supported by the California Strategic Growth Council's Transformative Climate Communities Program with funds from California Climate Investments' Cap-and-Trade Dollars at Work. Stockton Rising offers several no-cost programs for residents in the Transformative Climate Communities Project Area. These programs include solar installation and energy- and water-efficiency upgrades, as well as a tree planting program.

NEW RESIDENTIAL ENERGY STANDARDS

All new buildings in California must meet the standards in Title 24, Part 6, of the California Code of Regulations (Building Energy Efficiency Standards for Residential and Nonresidential Buildings). These regulations respond to California's energy crisis and the need to reduce energy bills, increase energy delivery system reliability, and contribute to an improved economic condition for the state. They were established in 1978 and most recently updated in 2021. Through the building permit process,

local governments enforce energy efficiency requirements. All new construction must comply with the standards in effect on the date a building-permit application is submitted. The City of Stockton's Building Department enforces Title 24 standards through its building permit process.

In addition to Title 24 requirements, the City's housing rehabilitation programs include requirements for the installation of water- and energy-efficient improvements, and the Housing Division supports low- and moderate-income residents with implementation of green building practices.

SUBDIVISION DESIGN FOR HEATING OR COOLING OPPORTUNITIES

Section 66473.1 of the State Subdivision Map Act requires that the "design of a subdivision for which a tentative map is required shall provide, to the extent feasible, for future passive or natural heating or cooling opportunities in the subdivision." Although this section does not contain any precise standards, the State Attorney General has opined that "a tentative map of a subdivision must be disproved if it fails to meet the design requirement of Government Code Section 66473.1."

In accordance with the provisions of the California Subdivision Map Act, Section 16.72.250 of Stockton's Municipal Code states that the City may require a subdivider to "provide, to the extent feasible, for future passive or natural heating or cooling opportunities in the subdivisions, in compliance with Map Act Section 66473.1, including orientation of a structure for southern exposure, shade, or prevailing winds."

WEATHERIZATION ACTIVITIES

Pacific Gas and Electric (PG&E) provides natural gas and electric services for the city of Stockton. PG&E offer a variety of programs to increase energy conservation and reduce monthly energy costs for lower-income households. The following programs, offered by PG&E, are aimed at increasing energy efficiency and are available to PG&E customers in Stockton.

- **Multifamily Energy Savings Program.** The Multifamily Energy Savings Program offers energy-saving opportunities, including no-cost energy assessment and project consulting and rebates for energy-saving upgrades. Eligible properties include attached residences with five or more units.
- **Energy Savings Assistance Program.** The Energy Savings Assistance Program provides energy-savings improvements to qualified low-income households at no charge. The energy-savings improvements increase energy efficiency of a home to decrease energy bills.

San Joaquin County Human Services Agency offers a weatherization program that provides energy-saving measures and repairs to homes, apartments, and mobile homes. These dwellings qualify for weatherization measures if the household income does not exceed a limit determined by the U.S. Department of Health and Human Services. Some of the energy-saving measures available include repair or replacement of refrigerators, stoves, water heaters, and microwaves; insulation; minor home repair; LED light bulbs; smoke and carbon monoxide detectors; shade screens; and weather-stripping.

In addition to the local programs described above, the California Department of Community Services and Development administers the federally funded Low-Income Home Energy Assistance Program (LIHEAP). This program provides two types of assistance—Weatherization Program and Energy Crisis Intervention Program. The Weatherization Program provides free weatherization improvement services to increase energy efficiency, such as attic insulation, caulking, water heater blankets, and heating and cooling system repairs to low-income households. The Energy Crisis Intervention Program provides assistance to low-income households that are in a crisis situation, such as receiving a 24 to 48 hour disconnect notice or service termination from their utility company.

Finally, the U.S. Department of Energy provides weatherization grants to homeowners similar to those offered by the U.S. Department of Housing and Human Services. The federal funds for the weatherization

program are provided through the American Recovery and Reinvestment Act Weatherization Assistance Program. The Department of Community Services and Development implements the program at the state level.

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POTENTIAL HOUSING CONSTRAINTS 6

MAJOR FINDINGS

- Based on analysis of the permitted densities and development standards, the City has found that the General Plan and Development Code facilitate a variety of housing types. The City allows residential development in nonresidential and mixed-use zones and permits densities as high as 136 units per acre in the downtown area.
- The City applies more flexible development standards for infill projects to encourage and maximize opportunities for development of vacant and underutilized land within city limits. In 2022, the City adopted a code amendment to allow Density Waivers for Small Infill Lots. The development standards of the underlying zoning designation, such as the density, setbacks, height, site coverage, and parking requirements, may be modified to create consistency with surrounding development and address physical site constraints.
- Overall, the City's parking standards are relatively low, both for downtown infill development and development outside the downtown. Parking standards do not represent a constraint to the development of housing and allow development to achieve maximum allowed densities. The City has also reduced or eliminated parking for housing developments, including transit-oriented developments (TOD), affordable housing, senior housing, small lots, etc.
- Accessory dwelling units (ADUs) are allowed by right and go straight to a building permit, unless they are located in a Design District.
- The City of Stockton's Development Code defines supportive housing as a "use by right." Therefore, supportive housing is allowed in the city wherever single-family and multifamily residential is allowed. The City's code does not constrain development of supportive housing.
- A low-barrier navigation center development is a use by right in special purpose or commercial zoning districts permitting multifamily dwellings.
- The City has acquired hotels to create a mixed income development, such as the Medici Artist Lofts. There is a mix of one-, two-, and three-bedroom apartments. Of the 34 units, 27 are affordable housing units for families with income levels between 30-60 percent area median income. Six of the units are market rate.

INTRODUCTION

State housing law requires the City to review both governmental and nongovernmental constraints to the maintenance and production of housing for all income levels. Since local governmental actions can restrict the development and increase the cost of housing, State law

requires the Housing Element to "address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing" (Government Code Section 65583(c)(3)).

The City is currently conducting a comprehensive update to its Development Code which is expected to be complete by the end of 2023. In addition, the City is preparing a Housing Action Plan and Neighborhood Actions Plans for three specific areas of the city. All of these efforts will address housing needs in the city. Policies and programs related to these efforts are included in the main element section of this document.

POTENTIAL GOVERNMENTAL CONSTRAINTS

Local governments have little or no influence on the national economy or the federal monetary policies that influence it. Yet these two factors have some of the most significant impacts on the overall cost of housing. The local housing market, however, can be encouraged and assisted locally. One purpose of the housing element is to require local governments to evaluate their past performance in this regard. By reviewing local conditions and regulations that may impact the development of the housing market, the local government can prepare for future growth through actions that protect the public's health and safety without unduly adding to the cost of housing production. Consistent with transparency requirements (Government Code Section 65940.1 subdivisions (a)(1)(A)) and (a)(1)(B)), the City's zoning, development standards, and fees are available on the City's website.

LAND USE CONTROLS

By definition, local land use controls constrain housing development by restricting housing to certain areas of the city and by restricting the number of housing units that can be built on a given parcel of land. The 2040 General Plan sets forth the City's policies regarding local land development. These policies, together with zoning regulations, establish the amount and distribution of land allocated for different uses.

General Plan Land Use Designations

The City of Stockton 2040 General Plan establishes land use designations for all land within the city boundaries. These land use designations specify the type of development the City will permit. The 2040 General Plan includes eight designations that permit a range of residential development types and densities (see **Table HE-56**): Residential Estate (RE), Low Density Residential (LDR), Medium Density Residential (MDR), High Density Residential (HDR), Administrative Professional (AP), Commercial (C), Open Space and Agriculture (OSA), and Mixed Use (MU). The General Plan allows flexibility by allowing residential uses in a variety of nonresidential designations. **Table HE-56** shows the General Plan designations that permit residential developments.

For the higher-density designations (HDR, AP, and C), maximum densities differ depending on the location. Development in the downtown is allowed at densities up to 136 dwelling units per acre (du/ac), while higher-density areas outside of the downtown have a maximum density of 30 du/ac.

Table HE-56: General Plan Land Use Designations Allowing Residential Uses
Stockton, 2022

LU DESIGNATION	CODE	USES	MAXIMUM NET RESIDENTIAL DENSITY (DU/AC)	CONSISTENT ZONING DISTRICTS
Residential Estates	RE	Single-family residential units, public and quasi-public uses, accessory dwelling units (ADUs), and other similar compatible uses.	1	RE
Low Density Residential	LDR	Single-family residential units, duplexes, triplexes, semi-detached patio homes, town homes, public and quasi-public uses, accessory dwelling units (ADUs), and other similar and compatible uses.	8.7	RL
Medium Density Residential	MDR	Single-family residential units, duplexes, triplexes, semi-detached patio homes, town homes, public and quasi-public uses, accessory dwelling units (ADUs, and other similar and compatible uses.	17.4	RM
High Density Residential	HDR	Multifamily residential units, apartments, dormitories, group homes, guest homes, public and quasi-public uses, and other similar and compatible uses.	30 outside downtown; 90 inside greater downtown; 136 inside Downtown Core	RH
Administrative Professional	AP	Business, medical, and professional offices, residential uses, public and quasi-public uses, and other similar and compatible uses. This designation is appropriate on the borders of residential areas.	30 outside downtown; 90 inside greater downtown; 136 inside Downtown Core	CO, UC, RH
Commercial	C	A wide variety of retail, service, and commercial recreational uses, business, medical and professional offices, residential uses, public and quasi-public uses, and other similar and compatible uses. Community or regional commercial centers as well as freestanding commercial establishments are permitted.	30 outside downtown; 90 downtown; 136 inside Downtown Core	CN, CG, CD, CL, CA, HDR
Open Space/ Agriculture	OSA	Agriculture, parks, single-family residential units, farmworker housing, wetlands, wildlife reserves, and other similar and compatible uses and structures related to the primary use of the property for preservation of natural resources or agriculture. Lands under this designation are intended to remain unincorporated and under the jurisdiction of San Joaquin County.	1 du/parcel (40-acre minimum parcel size) FAR 0.01	OS
Mixed Use	MU	A mixture of compatible land uses, including residential, administrative and professional offices, retail and service uses, industrial, and public and quasi-public facilities to be determined through a Master Development Plan adapted concurrently with the designation of the property as MX.	30	MX

Source: Stockton General Plan 2040, 2022.

Zoning

The City regulates the type, location, and scale of residential development primarily through its Development Code (Title 16 of the Stockton Municipal Code). Table HE-57 lists and describes the zoning districts that allow residential development. The Stockton Development Code explicitly states the permitted maximum residential density for each zoning district, including residential zones, commercial zones, and other zones. These density standards are consistent with the standards in the General Plan.

Table HE-57: Zoning Districts Allowing Residential Uses

Stockton, 2022

ZONING DISTRICTS	CODE	ZONE DESCRIPTION	MIN. TOTAL LOT AREA	RESIDENTIAL DENSITY RANGE
Residential Estates	RE	Applied to single-family residential development on large lots. It is intended to provide a transition from rural to urban areas on the urban fringe.	1 acre	1 per lot
Residential Low Density	RL	Applied to single-family residential neighborhoods, low-density residential Planned Developments, and/or other low-density residential development, and is intended to maintain densities and protect existing neighborhood character.	5,000 SF[1]	0 to 8.7 du/acre
Residential Medium Density	RM	Applied to more intensely developed residential neighborhoods and/or other medium-density residential Planned Developments. Allowable housing types may include single-family independent dwelling units, duplexes, triplexes, townhouses, and multifamily units.	5,000 SF	8.8 to 17.4 du/acre
Residential High Density	RH	Applied to high-density residential neighborhoods. Allowable housing types may include multifamily and various types of group housing, as well as high-density, single-family residential development.	7,500 SF	30 outside downtown; 90 inside greater downtown; 136 Inside Downtown Core
Commercial Office	CO	Intended to be a transitional area between residential and general commercial uses. The primary uses in this district include offices, incidental retail, residential, and/or residential in conjunction with an office, and other compatible uses.	7,500 SF	30 outside downtown; 90 inside greater downtown; 136 Inside Downtown Core
Commercial Large-Scale	CL	Applied to areas appropriate for large-scale integrated commercial retail centers with shared parking facilities. The CL zoning district is intended to serve a regional market area, and is to be applied to sites of at least 25 acres.	None	30 outside downtown; 90 inside greater downtown; 136 Inside Downtown Core
Commercial Neighborhood	CN	Applied to small-scale, limited retail and service areas that are designed to provide for the daily needs of the residents of the immediate, surrounding neighborhood.	None	30 outside downtown; 90 inside greater downtown; 136 Inside Downtown Core
Commercial General	CG	Applied to areas appropriate for a wide variety of general commercial uses, including retail, personal and business services; commercial recreational uses; and a mix of office, commercial, and/or residential uses.	None	30 outside downtown; 90 inside greater downtown; 136 Inside Downtown Core
Commercial Downtown	CD	Applied to the downtown commercial area of the city. The intent of the CD zoning district is to encourage a mix of high-intensity uses to create a lively, pedestrian-friendly environment, with high visual quality. Appropriate uses include large-scale commercial offices and office support uses, high-density residential development, tourist and lodging-oriented uses, and governmental facilities.	None	30 outside downtown; 90 inside greater downtown; 136 Inside Downtown Core
Public Facilities	PF	Applied to areas appropriate for a variety of public and quasi-public land uses, including facilities and lands owned by the City, County, State, or Federal Governments.	None	FAR 0.2
Mixed Use	MX	Intended to apply to large properties of at least 100 acres that can accommodate a wide range of land uses. A Master Development Plan is required for each MX zoning district to identify specific allowable land uses and development regulations.	Per Master Development Plan	17.5 to 30 du/ac
University/ College	UC	Applied to areas of the city that are dedicated to private institutions of higher learning, to enable campus modifications or changes with the minimum, appropriate land use regulations. A Master Development Plan is required for each UC zoning district to identify specific allowable land uses and development regulations.	Per Master Development Plan	FAR 0.5 outside the Greater Downtown; 5.0 inside the Greater Downtown Area

ZONING DISTRICTS	CODE	ZONE DESCRIPTION	MIN. TOTAL LOT AREA	RESIDENTIAL DENSITY RANGE
Open Space/ Agriculture	*OSA*	*Agriculture, parks, single-family residential units, farmworker housing, wetlands, wildlife reserves and other similar and compatible uses and structures related to the primary use of the property for preservation of natural resources or agriculture. Lands under this designation are intended to remain unincorporated and under the jurisdiction of San Joaquin County.*	*40 acres* *FAR 0.01*	*1 du/parcel*

Note:
[1]10,000 square feet for duplexes
Source: City of Stockton, Development Code, 2022.

Table HE-58 shows which land use permit is required for different types of housing in zones allowing residential uses. If a housing type is allowable in a particular zone, the use is subject to one of the following land use permit requirements:

- **Permitted (P).** All land uses shown with a "P" in the table are allowed subject to compliance with all applicable provisions of the Development Code. Site Plan Review is required for new construction, for a change in use, or change to a more intensive use, except for those uses that are exempt. Exempt uses include accessory dwelling units, single-family residential, duplex units, triplex units, development projects entitled through a different permit process and minor improvements such as fences and other exterior improvements.
- **Land Development Permit (L).** All land uses shown as "L" in the table that require construction of new structures or improvements, the expansion of an existing facility, or a change to a more intensive use, as determined by the director, require the approval of a Land Development Permit.
- **Administrative Use Permit (A).** All land uses shown with an "A" in the table are allowed subject to the approval of an Administrative Use Permit. The director has the decision-making authority to approve an administrative use permit.
- **Commission Use Permit (C).** All land uses shown with a "C" in the table are allowed subject to the approval of a Commission Use Permit. The Planning Commission has the decision-making authority to approve a Commission Use Permit.
- **Empty Box = Use not Allowed**

To address this type of request in 2022, the City adopted a code amendment to allow Density Waivers for Small Infill Lots. This process is described in Section 16.52.030(A)(b) of the Development Code as follows:

a. **Density.** Density may be reduced or increased at the discretion of the Director only under the following circumstances:

   i. The decrease or increase is less than 25 percent of the required minimum or maximum density for the zoning district;

   ii. The decrease or increase is compatible with existing development; and

   iii. The decrease or increase will further the aims of this chapter, or as allowed under the density bonus provisions in compliance with Chapter 16.40 (Affordable Housing Incentives/
   Density Bonus Provisions).

The development standards, including setback, lot coverage, and maximum height requirements for zones that allow residential development are shown in Table HE-59.

Table HE-58: Permitted and Conditionally Permitted Residential Uses
Stockton, 2022

RESIDENTIAL USE TYPE	PERMIT REQUIRED BY ZONING DISTRICT														
	RE	RL	RM	RH	CO	CN	CG	CD	CL	CA	IL	IG	PT	PF	OS
Caretaker and Employee Housing	A				P	P	P	P	P	P	P	L	L	L	L
Duplexes		P	P	P				P						L	
Cottage Court		C	P	P		P		P						L	
Mobile Home Parks		A	A	A			A	A							
Mobile Home/ Manufactured Home[1]	P	P	P	P				P						L	
Multifamily Dwellings			P	P	P	P	P	P	C					L	
Co-living (dwelling unit facility)[2]				A	A	A	A	A							
Organizational House				A		A	A	A							
Assisted Living Facilities	A		C	P	P	P	P	P						L	
Care Homes, 6 or Fewer Clients[3]	-	P	P	P				P						P	
Family Care Homes, 7 or More Clients[3]	C			C				C						L	
Senior Care Facilities, 7 or More Clients			A	A	A			A						L	
Rooming and Boarding Houses				A				A						L	
Senior Residential Projects			P	P	P	P	P	P	P					L	
Accessory Dwelling Units	P	P	P	P	P	P	P	P	P	P				P	
Single Family Dwellings	P	P	P	P				P						L	
Townhouses		A	P	P	P	P	P	P						L	
Triplexes			P	P		P		A						L	
Fourplexes			P	P		P		A							
Emergency Shelters				C	C		C	C			A	A		A	
Low Barrier Navigation Center[4]					P	P	P	P	P	P				P	
Supportive Housing	P	P	P	P	P	P	P	P	C					P	
Transitional Housing	P	P	P	P	P	P	P	P	C					P	

Notes: P = permitted use; L= land development permit required; C = commission use permit required; A= administrative use permit required; empty box= use not allowed

[1] A mobile home on a permanent foundation is treated as a single-family dwelling.

[2]A permanent housing facility consisting of single-room occupancy units, where each bedroom is considered a separate living quarter to be occupied by permanent residents.

[3] Care homes include adult residential facilities, adult day care facilities, day treatment facilities, foster family homes, group homes, residential care facilities, small family homes, social care facilities, social rehabilitation facilities, community treatment facilities, intermediate care facilities, convalescent homes and nursing homes, pediatric day health and respite care facilities, intermediate care facilities for the developmentally disabled and congregate living health facilities, guest homes and rest homes.

Family Care Homes include adult residential facilities, adult day care facilities, day treatment facilities, group homes, residential care facilities, facilities for wards of the court, and residential care facilities for AIDS patients, intermediate care facilities convalescent homes and nursing homes, intermediate care facilities for the developmentally disabled and congregate living health facilities.

[4]Per Stockton Development Code Section 16.20.020 A low-barrier navigation center development is a use by right in special purpose or commercial zoning districts permitting multifamily dwellings.

Source: City of Stockton Development Code, Division 2, Chapter 16.20.020, 2015: Allowable Land Uses and Permit Requirements; 2022.

Table HE-59: Development Standards in Zones That Allow Residential Development

Stockton, 2022

ZONE	MAX. NET RESIDENTIAL DENSITY (DU/AC)	FAR	FRONT SETBACK	LOT WIDTH	MIN. SIDE SETBACK[3]	MIN. SIDE SETBACK FROM STREET	MIN. REAR SETBACK	MAX. LOT COVERAGE (%)	MIN. LOT AREA	MAX. HEIGHT[4]
RE	0 to 1	-	30 ft	150 ft	10 ft		30 ft	25%	1 ac	
RL	0 to 8.7	-	20 ft						5,000 sf	
RM	8.8 to 17.4	0.3	15 ft							
RH	17.5 to 30 outside Greater Downtown 20 to 90 inside Greater Downtown 20 to 136 inside Downtown Core	0.3 outside Greater Downtown 3.0 inside Greater Downtown 5.0 inside Downtown Core	15 ft	50 ft	5 ft	10 ft	10 ft	50%	7,500 sf	35 ft
CO	17.5 to 30 outside Greater Downtown 20 to 90 inside Greater Downtown 20 to 136 inside Downtown Core	0.3 outside Greater Downtown 3.0 inside Greater Downtown 5.0 inside Downtown Core	10 ft		5 ft			60%	7,500 sf	45 ft
CN			None[1]			None[1]		100%		35 ft
CG			10 ft			10 ft		60%		45 ft
CD			None			None		100%		No Limit
CL	-	-			N/A[2]		None[2]	50%	No Minimum	75 ft
CA	-	-		No Minimum						45 ft
IL	-	0.6	10 ft			10 ft				60 ft
IG	-	0.6						60%		No Limit
PT	-	0.5 – 0.6								
OS	-	0.01	20 ft		20 ft	20 ft	20 ft		5 acres	35 ft
PF		0.5 – 0.6	10 ft		N/A[2]	10	N/A[3]	50%	No Minimum	75 ft
MX	17.5 – 30	0.5								
UC	-	0.5 Outside Greater Downtown 5.0 Inside Greater Downtown	Per master develop-ment	Per master develop-ment	Per master develop-ment	Per master develop-ment	Per master develop-ment	Per master development	Per master develop-ment	Per master develop-ment

[1] If adjacent to residential zoning districts, the setback shall be none if the structure in the CN zoning district is at least 20 feet from the residential zoning district, otherwise the setback shall be 10 feet.

[2] None required, except when adjacent to a residential zone, structures shall be set back a distance of 10 feet or as required by Article 3 for specific land uses. In the CA zone, structures shall be set back from a residential zone equal to their height.

[3] Per Program 17, interior side setbacks in the CO zone will be decreased to 0' and in the CO zone, when adjacent to residential, increased from 5 to 10 feet.

[4] Per Program 17, allowed heights will increase to 60' with a CUP in the CO zone (45' without a CUP will not change), 45' in the CN and RH zones and, 75' in the CG zone.

Infill Development Standards

The City applies more flexible development standards for infill projects to encourage and maximize opportunities for development of vacant or underutilized land within city limits. Section 16.52.030 of the Development Code contains the infill development standards. The development standards of the underlying zoning designation, such as the density, setbacks, height, site coverage, and parking requirements may be modified to create consistency with surrounding development and address physical site constraints.

If an applicant wanted to obtain flexibility in development standards on an infill parcel, the applicant would first visit the Permit Center to determine whether or not the project met the following criteria:

A. Vacant and developed property, with or without existing structures, of less than a total of five acres, which consist of:

   a. One legal lot; or

   b. Two or more contiguous, commonly-owned legal lots that are not separated by a public street;

B. Bounded on at least three sides by existing urban uses or development;

C. Served by existing water, sewer, drainage, streets, and schools; and

D. Qualify for categorical exemption under the California Environmental Quality Act, Section 15332, CEQA, Class 32.

In addition to the land uses allowed in Table HE-60, infill projects consisting of the land uses shown in the table are allowed in any zoning district subject to the permit requirements shown in Table HE-60.

The City offers a preliminary project review process (Economic Review Committee, or ERC) in which developers are given the opportunity to meet with representatives from the City's various permitting departments (e.g., Community Development, Public Works, and Municipal Utilities) to provide feedback on proposed site plans, as well as information on topics such as zoning, use permits, and public improvements to assist the developer in the permitting and development process. The ERC preliminary project review process is provided free of charge by the City.

Table HE-60: Allowable Land Uses and Permit Requirements for Residential Infill Projects

Stockton, 2022

RESIDENTIAL USE TYPES	*PERMIT REQUIREMENT*
Single-family homes on blockfaces in which at least 50% of the blockface is occupied by existing single-family homes	*P*
Single-family homes on blockfaces in which less than 50% of the blockface is occupied by existing single-family homes, except that single-family homes shall not be allowed in an Industrial zoning district or in an area designated as Industrial on the General Plan.	*A*
Duplexes and Triplexes	*A*
Townhouses	*A*
Multifamily	*A*
Live Work Space	*P*
Studios	*A*

Notes: P = permitted use; C = commission use permit required; A= administrative use permit required; empty box= use not allowed
Source: City of Stockton Development Code, Division 2, Section 16.52.050: Allowable Land Uses and Permit Requirements for Infill Projects; September 2022.

Cumulative Impact of Development Standards

As shown in Table HE-61. Development Scenarios, The City evaluated the cumulative impact of its land use controls on the cost and supply of housing, including development standards that limit sites' building envelope (setbacks, private open space, and parking) and lot coverage restrictions. Based on this evaluation, none of the land use controls in conventional residential zoning districts would prevent an applicant from reaching the maximum density allowed for single-family development in single family-zones and multifamily developments in all zones where multifamily is allowed, or otherwise constrain housing development. Current development standards for the residential zones that permit multifamily housing were applied to sites of varying size listed in Table A-1 Sites Inventory.

The maximum allowed density in the RM zone is 17.4 units per gross acre. Maximum allowable densities in the RH, CD, CG, CO, CL and CN zones are identical to each other and dictated by geographic location (Areas): up to 136 units per gross acre within the Downtown Core; up to 90 units per gross acre within the Greater Downtown boundary; and up to 30 units per gross acre outside the Greater Downtown boundary. Density bonus units are not factored into the calculations.

The minimum open space requirement for parcels in the RM and RH zones is 100 square feet per unit (minimum 40 square feet of private open space per unit). The private open space requirements for the CD, CG, CO, and CN zones are also dictated by geographic location, increasing from 50 to 75 to 100 square feet per unit as you move out from the Downtown Core. Other development standards for each zone are consistent regardless of Area, meaning that, excluding density, the standards for a parcel zoned CN within the Downtown Core are the same as those for a CN-zoned parcel outside the Greater Downtown boundary.

The minimum parking requirement for parcels in the RM zone is 1.2 spaces per unit. Minimum parking standards for the RH, CD, CG, CO, and CN zones are also dictated by geographic area. Outside the Greater Downtown boundary, multifamily developments must provide 1.2 spaces per unit. The requirement decreases to 0.5 spaces per unit within the Greater Downtown boundary, with exceptions for properties that fall within the Magnolia Historic District, Central Parking District, Parking Improvement District No. 2001-1, or are within one-half mile of a major transit stop as defined in Section 21155 of the Public Resources Code. Residential projects within the aforementioned areas are completely exempt from minimum parking standards. Because Parking Improvement District No. 2001-1 completely encompasses the Downtown Core, the parking requirement for residential development within the core is effectively reduced to zero. Additionally, varying parking requirement reductions may be granted to a project that provides any combination of affordable housing, motorcycle parking, additional bicycle parking, preferred carpool/vanpool parking, electric vehicle charging stations, or shared parking. These discretionary parking requirement reductions are not factored into the calculations.

The analysis suggests that, even on the smallest parcels in the commercial and RH zoning districts, the maximum density could be achieved with a mix of studio and one-bedroom units served by tuck-under and/or off-site parking. The first step in the calculation was to determine the allowable building footprint given the site size and the maximum lot coverage. The next step was to determine the maximum allowed building envelope given the site area minus the required setbacks, open space, and parking. To determine maximum building square footage, the building envelope was multiplied by the respective zone's maximum height, in stories, to determine the maximum building square footage.

The inventory sites analyzed below were selected because they represent development in the most constrained circumstances, i.e. small lots with conventional setbacks (non-zero) in the highest density area (Downtown Core and within Greater Downtown boundary). As described above, parking is not required in the Downtown Core. To reach maximum density inside the Greater Downtown, residential development in the RH zone may use tuck-under and/or shared off-site parking, while development in the CD, CG, CO, and CN zones must use shared off-site parking (already a common practice in Stockton and further enabled by AB 894, Friedman). AB 894 requires that a local agency must allow parking spaces identified in a shared parking agreement to count towards meeting parking requirements for new or existing developments, provided a robust parking analysis accompanies the application. Parcels outside the Greater Downtown can surface-park the required spaces without issue. The accompanying tables show the parking area required for each scenario and corresponding parking method (surface, tuck-under, off-site).

Results for the CO zone may be extrapolated to the CG zone, as the development standards are identical in all ways except maximum height – CG permits an additional two stories by-right. Similarly, results for the CN zone may be extrapolated to the CD zone, as the development standards are identical in all ways except maximum height – CD does not have a maximum height.

Table HE-61: Development Scenarios

RESIDENTIAL MEDIUM (RM) ZONE	SITE 3-55		
APN:	15315040		
Sub-Area:	N/A		
Square footage:	4,750		
Length (feet):	95		
Width (feet):	50		
Lot coverage:	0.5		
Number of stories (35 ft max):	2		
Maximum building footprint, given lot coverage requirements:	2,375 sqft		
Maximum building envelope, given setbacks (15, 10, 5, and 5 feet), parking (see below for spaces per unit), and communal/private open spaces (100 sqft per unit):	1,847		
Parking spaces per unit:	1.2		
Area required for parking (sqft):	480		
Parking type:	Surface		
Maximum building square footage (stories * envelope):	3,694		
Number of units:	2		
Average unit square footage:	1,847		
Achievable Density (units per acre):	**17.4**		
Permitted Density (units per acre):	**17.4**		
RESIDENTIAL HIGH (RH) ZONE	**SITE 1-30**	**SITE 2-31**	**SITE 4-189**
APN:	13720204	13712211	16919012
Sub-Area:	Downtown Core	Inside Greater Downtown	Outside Greater Downtown
Square footage:	7,400	4,250	5,200
Length (feet):	100	85	100
Width (feet):	74	50	52
Lot coverage:	0.5	0.5	0.5
Number of stories (35 ft max; no max within DT Core / Greater DT):	6	4	3
Maximum building footprint, given lot coverage requirements:	3,700	2,125	2,600
Maximum building envelope, given setbacks (15, 10, 5, and 5 feet), parking (see below for spaces per unit), and communal/private open spaces (50 | 75 | 100 sqft per unit):	2,500	1,500*	1,544
Parking spaces per unit:	N/A	0.5	1.2
Area required for parking (sqft):	N/A	900	960
Parking type:	N/A	Tuck-under / Off-site	Surface
Maximum building square footage (stories * envelope):[1]	15,000	6,000	4,632
Number of units:	23	9	4
Average unit square footage:	612	627	1,118
Achievable Density (units per acre):	**136**	**90**	**30**
Permitted Density (units per acre):	**136**	**90**	**30**

COMMERCIAL OFFICE (CO) ZONE	SITE 1-28	SITE 2-42	SITE 2-17
APN:	13719006	13917410	127162212
Sub-Area:	Downtown Core	Inside Greater Downtown	Outside Greater Downtown
Square footage:	5,600	4,750	4,750
Length (feet):	100	95	95
Width (feet):	56	50	50
Lot coverage:	0.6	0.6	0.6
Number of stories (45 ft max; 60 ft max w/ CUP in Downtown Core):	5	4	4
Maximum building footprint, given lot coverage requirements:	3,360	2,850	2,850
Maximum building envelope, given setbacks (15, 10, 5, and 5 feet), parking (see below for spaces per unit) and communal/private open spaces (50 | 75 | 100 sqft per unit):	2,030	1,500*	1,158
Parking spaces per unit:	N/A	0.5	1.2
Area required for parking (sqft):	N/A	1,000	720
Parking type:	N/A	Off-site	Surface
Maximum building square footage (stories * envelope):[1]	10,150	6,000	4,632
Number of units:	17	10	3
Average unit square footage:	597	600	1,544
Achievable Density (units per acre):	**136**	**90**	**30**
Permitted Density (units per acre):	**136**	**90**	**30**

COMMERCIAL NEIGHBORHOOD (CN) ZONE	SITE 1-31	SITE 3-32	SITE 2-17
APN:	13720217	15117045	12716212
Sub-Area:	Downtown Core	Inside Greater Downtown	Outside Greater Downtown
Square footage:	4,750	4,250	5,600
Length (feet):	95	85	95
Width (feet):	50	50	50
Lot coverage:	1.0	1.0	1.0
Number of stories (45 ft max):	4	4	4
Maximum building footprint, given lot coverage requirements:	4,750	4,250	5,600
Maximum building envelope, given setbacks (15, 10, 5, and 5 feet), parking (see below for spaces per unit) and communal/private open spaces (50 | 75 | 100 sqft per unit):	1,800	1,575*	1,784
Parking spaces per unit:	N/A	0.5	1.2
Area required for parking (sqft):	N/A	900	960
Parking type:	N/A	Off-site	Surface
Maximum building square footage (stories * envelope):[1]	7,200	6,300	7,136
Number of units:	15	9	4
Average unit square footage:	480	700	1,784
Achievable Density (units per acre):	**136**	**90**	**30**
Permitted Density (units per acre):	**136**	**90**	**30**

Source: City of Stockton, 2023[1] Area required for parking not included in this value.

Conclusions

Based on analysis of the permitted densities and development standards, the City has found that the General Plan and Development Code facilitate production of a variety of housing types. The City allows residential development in nonresidential and mixed-use zones and permits densities as high as 136 units per acre in the downtown area. Additionally, the City has flexible development standards to encourage the development of small infill parcels.

BUILDING CODES AND ENFORCEMENT

Building codes and their enforcement influence the style, quality, size, and costs of residential development. Such codes can increase the cost of housing and impact the feasibility of rehabilitating older properties that must be upgraded to current code standards. In this manner, building codes and their enforcement can act as a constraint on the supply of housing and its affordability.

The City of Stockton has adopted the 2022 California Building Code (CBC). These local amendments include:

- **Alternate materials and methods of construction:** The Building Official may approve alternate materials and methods of construction provided he finds that the proposed design is satisfactory and complies with the provisions of the model codes and that the material, method, or work offered model codes in quality, strength, effectiveness, fire resistance, durability, safety, and sanitation.
- **Tests**: Whenever there is insufficient evidence of compliance with the adopted model codes or evidence that any materials or any construction does not conform to the requirements of the adopted model codes, the Building Official may require tests as proof of compliance to be made at the expense of the owner or his agent by an approved agency.

The minimum requirements of the CBC and other model codes may have added to the cost of housing over the years. However, governmental agencies at all levels as well as organizations representing building officials have decided that these requirements are necessary to achieve a minimum level of health and safety.

The City's building codes are consistent with the codes applied in other jurisdictions throughout California and do not negatively impact the construction of affordable housing.

PARKING STANDARDS

Since off-street parking often requires large amounts of land, parking requirements are one of the development standards that can impact the development of compact, affordable housing. Off-street parking requirements increase the cost of development and limit the funds available for providing housing. Additionally, parking standards limit the ability to achieve compact, urban, infill development. Most municipalities adopt parking standards that exceed the actual parking needs of the population.

Stockton's off-street parking standards for residential uses are summarized in **Table HE-62**. The City requires two covered parking spaces per single-family home, one space per multifamily unit, half a space for both greater downtown and outside the downtown, and one space per unit in townhouses. No off-street parking is required for ADUs.

The Development Code allows the Director or Commission to reduce or waive up to 20 percent of the parking requirements, or a minimum of one space, under the following conditions:

- The structure was designed and intended for nonresidential use;
- The owner or developer substantiates that the provision of additional parking is unreasonable and economically unsound and the compliance with the provisions of this chapter would entail severe hardship; and
- The structure or structures were originally built before the effective date of the current parking requirements.

Overall, the City's parking standards are relatively low, both for downtown infill development and development outside the downtown. The City has also reduced or eliminated parking for housing developments, including transit-oriented developments (TOD), affordable housing, senior housing, small lots, etc. Parking standards do not represent a constraint to the development of housing and

allow development to achieve maximum allowed densities. Despite parking reductions on many projects, parking spaces for those with disabilities continue to be provided. No projects have requested to waive inclusion of parking spaces for those with disabilities. The City will continue to explore best practices for parking standards and provide additional incentives to reduce costs and align standards with current housing market demands, including the needs and demands of residents with disabilities.

Table HE-62: Required Off-Street Parking Spaces
Stockton, 2022

RESIDENTIAL USE	SPACES/UNIT	GUEST PARKING
Single-family dwellings	*2 per house in enclosed garage*	-
Townhouses and duplexes	*1 covered space per unit, except in the Downtown Core, 0.5 per unit*	-
Triplexes and Fourplexes	*1 per unit, except in the Downtown Core, 0.5 per unit*	-
Multifamily dwellings	*1 per unit*	*1 per 4 units*
Greater Downtown	*0.5 per unit*	-
Downtown Core[1]	*0.5 per unit*	-
Affordable Housing	*0.5 per unit*	*1 per 8 units*
Organizational houses	*1 per 3 occupants*	*1 per 6 occupants*
Senior residential projects	*1 per 2 units*	*1 per 10 units*
Mobile home parks	*1 per mobile home*	*1 per 4 units*
Residential care facilities		
All, except care homes (6 or fewer)	*1 per 5 beds*	*1 per 10 beds*
Family care homes (7 or more)	*2 per house in enclosed garage*	*1 per 10 beds*
Rooming and boarding houses	*1 per 3 occupants*	-
Single-room occupancy facilities (SRO)/Co-Living	-	*1 per 2 guest room*
Transitional housing	*1 per 2 beds*	-
Caretaker and employee housing	*1 covered space per unit*	-
Emergency shelters	*2 spaces per facility* *For staff 1 space per 10 occupants allowed at max. capacity*	-
Accessory dwelling units	*No off-street parking is required for accessory dwelling units*	-

Note 1. Exemptions for parcels within a parking assessment district per Section 16.64.060, Parking Assessment Districts, https://library.qcode.us/lib/stockton_ca/pub/municipal_code/item/title_16-division_3-chapter_16_64-16_64_060.
Source: City of Stockton Development Code, Section 16.64.040, Table 3-9; November 2022.

ON-/OFF-SITE IMPROVEMENT REQUIREMENTS

In Stockton, the developer is responsible for complete street improvements for streets of 144 feet right-of-way (flared to 155 feet at major intersections) and less. Existing standards for local streets vary by scenario. For example, a low volume curb to curb street requires a minimum standard of 34/36 foot wide street. A medium volume street requires a width of 36 feet. In compliance with the City's standard specifications and plans, the improvements shall consist of, but not be limited to, the following:

1. Curb, gutter, and sidewalk along street frontages;
2. Replacement of broken or displaced curb, gutter, and sidewalk;
3. Replacement of unnecessary driveways with curb, gutter, and sidewalk;
4. Wheelchair ramps at curb returns;
5. Pavement sections on new streets;

6. Improvements to, or construction of, interchanges with State highways;
7. On existing streets within the subdivision or development, the existing pavement shall be overlaid or reconstructed as directed by the City Engineer to handle the projected traffic;
8. On peripheral streets, the existing pavement shall be overlaid or reconstructed to the centerline of the street as directed by the City Engineer, to accommodate the projected traffic, and the curb, gutter, and sidewalk installed;
9. Streets shall be widened in compliance with the specific plan, precise road plan, or master development plan, and the existing pavement shall be overlaid or reconstructed to accommodate the projected traffic;
10. Fences;
11. Landscaped parkways;
12. Tree wells and sprinkler system;
13. Street lighting; and
14. Street signs.

Site improvements necessary to facilitate the production of housing vary greatly. Some housing developments can connect to existing infrastructure facilities. In the City of Stockton public improvements for new subdivisions and single-lot development are dependent on the location of the project.

For greenfield developments, developers are responsible for constructing typical on-site improvements and all off-site public infrastructure associated with the new development. In addition, greenfield development is required to contribute fees to support the City's construction of critical infrastructure, such as sewer and water facilities, and parks.

Off-site improvements for greenfield developments typically include frontage improvements and underground utilities as well as the construction of new streets depending on the location.

For large, master planned development projects in greenfield areas, such as the Cannery Park, University Park and Westlake at Spanos Park projects, which are identified in the Housing Sites Inventory chapter as pipeline projects that are currently under construction, the City required that the developer construct all the infrastructure and public improvements needed to serve the new development.

OPEN SPACE AND PARK REQUIREMENTS

Open space and park requirements can decrease the affordability of housing by increasing developer fees and/or decreasing the amount of land available on a proposed site for constructing units. All housing units constructed in the city must pay a parkland fee to fund the development of neighborhood and community parks. As of the October 2022-2023 Fiscal Year, the fee was $2,798 per single-family unit and $1,712 per multifamily unit.

For land uses and development within the residential, low density (RL) zoning district, a minimum of 150 square feet of private open space is required per duplex unit, beyond the minimum required front-yard, rear-yard, and side-yard setbacks. For multifamily projects, the City requires 100 square feet of usable, common open space for each dwelling unit. However, per Program 17, this requirement will be reduced to 50 square feet in the Downtown Core Area and 75 square feet in the Greater Downtown Area. The City also requires a minimum 40 square feet of private open space (e.g., patios, balcony, and decks). The area provided for private open space may be applied to the common open space requirement.

In addition to the requirements for residential and nonresidential, the following open space requirements apply to all planned development permits:

a. Open space shall be designed as a major element of the project;

b. Open space shall be located to take advantage of, and to help preserve, existing natural amenities (e.g., trees, topographic features, waterways, and views);

c. Open space shall generally be clustered to create larger-scale open spaces, but shall also be used to buffer incompatible uses and to provide corridors of space around and within developed areas to achieve a spacious character and convenient linkage to all parts of the site;

d. All landscaped areas shall be designed, installed, and irrigated in compliance with Chapter 16.56 (Landscaping Standards);[1]

e. Open space areas shall not include streets, whether public or private, off-street parking or landscaping required for the parking lot, access drives, loading areas, or area(s) covered by structures;

f. The location of all open space, including any off-premises locations, shall be identified on appropriate plans; and

g. The City's Planning Commission may modify any open space requirement after considering the general purpose and nature of the project. If the open space requirement is modified, another amenity(s) must be provided.

The park dedication requirement, the park improvement fees, and the open space requirements do not represent excessive constraints on residential development. To help waive park fees, the Stockton Economic Stimulus Plan provides a fee reduction for some of the Public Facility Fees (PFF) for both single-family and multi-family residential projects in Stockton. A reduction of PFF up to a total of $19,997 or 100%, whichever is less, for single-family residential and $14,080 per unit for multi-family residential for these fee categories:

- City Office Space
- Libraries
- Fire Stations
- Parks
- Community Recreation Centers
- Police Stations
- Street Improvements

PROCESSING AND PERMIT PROCEDURES

Similar to other jurisdictions, the City has several procedures it requires developers to follow for processing development entitlements and building permits. Although the permit approval process must conform to the Permit Streamlining Act (Government Code Section 65920 et seq.), housing proposed in the city is subject to one or more of the following review processes: environmental review, zoning, subdivision review, and building permit approval. The City provides ample opportunities for most housing projects. Most housing projects that come forward are allowed by-right, and only require site plan and design review. These review processes are defined as ministerial in the Development Code and are ministerial actions that do not require hearings nor are subject to CEQA.

Permit Streamlining Act

The Permit Streamlining Act was enacted in 1977 in order to expedite the processing of permits for development projects. Government Code § 65921. The Permit Streamlining Act achieves this goal by (1) setting forth various time limits within which state and local government agencies must either approve or disapprove permits and (2) providing that these time limits may be extended once (and only once) by agreement between the parties. The Permit Streamlining Act does not apply to legislative land use decisions or to ministerial permits. The City regularly adheres to the time limitations by providing completeness responses to applicants within 30 days of receiving a development application.

Projects that are exempt from California Environmental Quality Act (CEQA) must be processed within 60 days of deeming the application complete. However, projects that require additional environmental analysis and disclosures to the public are granted additional time to prepare an initial study and circulate the environmental findings for public comments. For projects that do not require review by the Planning Commission or Council, the determination of whether an EIR, ND, or MND is required is made by Community Development Department staff under the direction of the Director. For projects that require review by the Planning Commission or Council, the determination is made by the Planning Commission or Council. The City will ensure that there is a process in place to monitor the intake of applications and evaluate whether the application is complete. The City will ensure that the CEQA determination of PRC 21080.1 will be made within the timeframe permitted by PRC 21080.2, and when the City determines that a project is exempt from CEQA, the

[1] City of Stockton, Landscaping Standards: https://library.qcode.us/lib/stockton_ca/pub/municipal_code/item/title_16-division_3-chapter_16_56

determination will trigger the Permit Streamlining Act (PSA) 60-day deadline (Gov. Code 65950(a)(5)).

Review Authority

There are four levels of review authority in Stockton listed from lowest to highest authority: 1) Director of Community Development, 2) Site Plan Review Committee, 3) Planning Commission and 4) City Council.

Residential Permit Processing

The City's review process for multifamily residential projects involves the following steps:

1. Submittal of an application to the Planning Division for Site Plan and Design review. These design reviews are defined as ministerial per the Stockton Municipal Code and are approved by the Community Development Director or their appointee. These approvals do not require a public hearing or public notice of determination as part of the approval.
2. Once the project is submitted, the Project is reviewed by City staff for Completeness and compliance with the City's design standards.
    a. This compliance review involves internal review committees that assist staff in confirming the site plan and design standards are adhered to in the proposed multifamily design.
    b. Since multifamily housing is a permitted use in all but two commercial and residential zones (Residential Low-Density "RL" and Commercial Auto "CA"), the design review is limited to onsite development (parking, landscaping, lighting) and architecture, and does not review the use or operation of the facility.
3. If items are missing from the application for Completeness and/or design changes are needed, City staff sends a letter requesting the items and/or changes within 30-days or sooner from the application date consistent with the state law.
4. If the applicant can provide the information and/or make the needed changes for resubmitting to the City, staff will then repeat the process and provide any additional items within 20 to 30 days or sooner given the amount of changes needed.
5. Once the project design is consistent with the City's design standards, City staff send the applicant an approval letter indicating the date Planning approved for construction.
    a. Should an applicant submit a complete project that complies with City design standards at the initial submittal, the review and approval process could take between four to six weeks.
    b. Approval allows the applicant to receive construction permit approval for the proposed design. The City also allows for concurrent design and construction plan review should the applicant wish to have the design and construction plans reviewed at the same time.

The City's review process for single family residential projects involves the following steps:

1. Submittal of an application to the Planning Division for Design review. These design reviews are defined as ministerial per the Stockton Municipal Code and are approved by the Community Development Director or their appointee. These approvals do not require a public hearing or public notice of determination as part of the approval.
2. Once the project is submitted, the Project is reviewed by City staff for Completeness and compliance with the City's design standards. If items are missing from the application for Completeness and/or design changes are needed, City staff sends a letter requesting the items and/or changes within 30-days or sooner from the application date consistent with the state law.
3. Since single family housing is permitted in all residential zones, the design review is limited to onsite development (parking, coverage, setbacks) and building massing (height, accessory structures).
4. If the applicant can provide the information and/or make the needed changes for resubmitting to the City, staff will then repeat the process and provide any additional items needed

within 20 to 30 days or sooner given the number of changes needed.

5. Once the project design is consistent with the City's design standards, City staff send the applicant an approval letter indicating the date Planning approved for construction.
    a. Should an applicant submit a complete project that complies with City design standards at the initial submittal, the review and approval process could take between four to six weeks.
    b. Approval allows the applicant to receive construction permit approval for the proposed design. The City also allows for concurrent design and construction plan review should the applicant wish to have the design and construction plans reviewed at the same time.

The City's review process for land division is described below. This includes tentative parcel maps (TPM) (4 lots or less) and tentative subdivision maps (TSM) (4 lots or greater) and involves the following steps:

1. An application for a Tentative Parcel Map (TPM) or Tentative Subdivision Map (TSM) is considered discretionary under the Stockton Municipal Code and the Subdivision Map Act.
2. Once the project is submitted, the Project is reviewed by City staff for Completeness and compliance with the City's design standards. If items are missing from the application for Completeness and/or design changes are needed, City staff sends a letter requesting the items and/or changes within 30-days or sooner from the application date consistent with the state law.
3. If the applicant can provide the information and/or make the needed changes for resubmitting to the City, staff will then repeat the process and provide any additional items within 20 to 30 days or sooner given the number of changes needed.
4. Once the project design is consistent with the City's design standards, conditions of approval are prepared, and City staff begins the approval process.
5. TPMs are approved by the Community Development Director, while TSMs are approved by the Planning Commission. Both require public notices sent to surrounding property owners within 300 feet of the project site. However, TPM notices only inform residents of the Director's decision, while TSM notices inform them of a Planning Commission hearing. Public hearings are not required for TPM approvals unless appealed to the Planning Commission, while an appeal to the Planning Commission is sent to the City Council.
6. Should an applicant submit a complete project that complies with City standards at the initial submittal, the review and approval process could take between four to eight weeks for a TPM (from application to approval) and two to four months for a TSM (from application to approval hearing).
7. Both tentative maps require Final Map submittal for recordation. Those review are considered ministerial and can take two to four months to complete depending on whether a complete Final Map application is submitted initially, and if any of the map conditions of approval require City Council finalization for items like annexations into financing districts or subdivision improvements agreements for construction securities (i.e., bonding).

More generally, all development applications are reviewed by staff and then, if applicable, scheduled for a public hearing with the Planning Commission. Alternatively, a decision is made at the staff level involving the Community Development Director and/or Site Plan Review Committee. The application only proceeds to City Council if it also requires a legislative act like a General Plan Amendment or Development Code Amendment, or if it is appealed. Residential projects in Stockton generally receive concurrent processing of various development permits (e.g. subdivision and zoning approvals), which reduces review times and related costs borne by the applicant.

Typical Permits Required for Residential Development

Many of the City's review procedures are handled at the staff level. For example, site plan and design review, minor zone modifications, and variances are conducted by the Community Development Director, except when the site

plan is part of a larger project that requires Planning Commission review.

Site Plan review begins with review by the Site Plan Review Committee who make a recommendation to the Director who makes the determination. The Site Plan Review Committee is an internal design review committee and makes recommendations to the approving body. Typical projects reviewed by the committee include annexations, condominium projects, multi-family projects and specific plans. Site Plan Review Committee meetings are not open to the public. Site Plan Review applies to any project that requires a Building Permit, where a change in use is proposed, or where a change in occupancy is proposed. Projects that are exempt from Site Plan Review include residential developments containing single-family, duplex, or triplex dwelling units. The committee and Director conduct a review of the location, design, site plan configuration, and effect of the proposed development by comparing the project's plans to:

1. The requirements and standards in the Municipal Code;
2. Required locational and developmental standards identified in the Development Code, including applicable standards for specific land uses in Chapter 16.80 (Standards for Specific Land Uses);
3. Requirements of the City's California Building Standards Code; and
4. The City's standard specifications and plans.

The Site Plan Review Committee may find that a project site plan is in compliance, needs very minor corrections, needs minor corrections, or needs major corrections. Based on the recommendation of the committee, the Director either approves or requests revisions and resubmittal of the site plan. Site Plan Review is a ministerial action that does not require California Environmental Quality Act (CEQA) review.

A use permit is a permit issued by the City for land uses that, although allowed in a specific zoning district, have the potential to adversely affect other land uses, transportation and parking, or other facilities in the vicinity. The use permit contains conditions to eliminate, or minimize to an acceptable level, any potentially adverse effects of the use. The City of Stockton currently has three types of conditional permits: Land Development Permits, Administrative Use Permits, and Commission Use Permits.

The review of projects for appropriate and efficient development and layout of a site is an integral part of the development approval process. All land uses shown as "L" in Table 2-2 of the Development Code (16.20.020, Allowable land uses and permit requirements) that require construction of new structures or improvements, the expansion of an existing facility, or a change to a more intensive use, as determined by the Director, require the approval of a Land Development Permit. The Director is the review authority for a Land Development Permit; however, the Director may defer action and refer the application directly to the Planning Commission.

The Review Authority may approve the Land Development Permit, with or without conditions if it finds all of the following:

1. The proposed land use activity is allowed within the subject zoning district with the approval of a Land Development Permit and complies with all other applicable provisions of the Development Code and the Municipal Code;
2. The proposed land use activity would be consistent with the general land uses, objectives, policies, and programs of the General Plan and any applicable Specific Plan, Precise Road Plan, or Master Development Plan;
3. The subject site would be physically suitable for the type and density/intensity of use being proposed, including the provision of services (e.g., sanitation and water), public access, and the absence of physical constraints (e.g., earth movement, flooding); and adequate in size and shape to accommodate the use and all fences and walls, landscaping, loading, parking, yards, and other features required by this Development Code; served by streets adequate in width and pavement type to carry the traffic generated by the proposed development.
4. The establishment, maintenance, or operation of the proposed use at the location proposed would not endanger, jeopardize, or otherwise constitute a hazard to the public convenience, health, interest, safety, or general welfare of persons residing or working in the neighborhood of the proposed use; and
5. The proposed permit would be in compliance with the provisions of the California Environmental Quality Act (CEQA) and the City's CEQA Guidelines.

An Administrative Permit is required for uses that have the potential for a slight impact on existing land uses surrounding a given site. The Community Development Director is the review authority for an Administrative Use Permit and may defer action and refer the application directly to the Planning Commission.

Permits for uses that have the potential for a significant impact on surrounding areas, either because of the size of the project or the nature of the use, require a Commission Use Permit. The Planning Commission serves as the review authority for Commission Use Permits.

The decision-making authority may approve or conditionally approve an application for an Administrative or Commission Use Permit if it finds all of the following:

1. The proposed use is allowed within the subject zoning district with the approval of a Use Permit and complies with all other applicable provisions of the Development Code and the Municipal Code;
2. The proposed use would maintain or strengthen the integrity and character of the neighborhood and zoning district in which it is to be located;
3. The proposed use would be consistent with the general land uses, objectives, policies, and programs of the General Plan and any applicable Specific Plan or Master Development Plan;
4. The subject site would be physically suitable for the type and density/intensity of use being proposed, including the provision of services (e.g., sanitation and water), public access, and the absence of physical constraints (e.g., earth movement, flooding);
5. The establishment, maintenance, or operation of the proposed use at the location proposed and for the time period(s) identified, if applicable, would not endanger, jeopardize, or otherwise constitute a hazard to the public convenience, health, interest, safety, or general welfare of persons residing or working in the neighborhood of the proposed use;
6. The design, location, size, and operating characteristics of the proposed use would be compatible with the existing and future land uses on-site and in the vicinity of the subject property; and
7. The proposed action would be in compliance with the provisions of CEQA and the City's CEQA Guidelines.

An applicant may choose to propose a Planned Development Permit for a more creative project produce a development of equal or greater quality than might otherwise occur with a more traditional development proposal. The Review Authority may approve the Planned Development Permit, with or without conditions if it finds all of the following:

1. The proposed development would:
   a. Be allowed within the subject zoning district;
   b. Generally comply with all of the applicable provisions of this Development Code relating to both on- and off-site improvements that are necessary to accommodate maximum flexibility in site planning and property development and to carry out the purpose, intent, and requirements of the respective zoning district, including prescribed development standards; and
   c. Be consistent with the general land uses, objectives, policies, and programs of the General Plan and any applicable specific plan, precise road plan, or master development plan;
2. There are adequate provisions for public utilities and services to ensure that the proposed development would not be detrimental to public health and safety;
3. The establishment, maintenance, or operation of the proposed activity at the location proposed would not endanger, jeopardize, or otherwise constitute a hazard to the public convenience, health, interest, safety, or general welfare of persons residing or working in the neighborhood of the proposed use;
4. The subject site would be:
   a. Physically suitable for the type and density/intensity of use and structure(s) being proposed including the provision of services (e.g., sanitation, utilities, and water), public access, and the absence of physical constraints (e.g., earth movement, flooding, etc.);
   b. Adequate in size and shape to accommodate the use and all fences and walls, landscaping, loading, parking, yards, and other features required by this Development Code; and
   c. Served by streets adequate in width and pavement type to carry the quantity and type of traffic generated by the proposed development.
5. The proposed development would produce a comprehensive development of superior quality (e.g., appropriate variety of structure placement and orientation opportunities, appropriate mix of structure sizes, high quality architectural design, increased

amounts of landscaping and open space, improved solutions to the design and placement of parking facilities, etc.) than might otherwise occur from more traditional development applications;

6. The proposed design and development is innovative and creative and in compliance with the standards identified in Chapter 16.68 (Planned Development Permit Standards); and
7. The proposed permit would be in compliance with provisions of the California Environmental Quality Act (CEQA) and the City's CEQA Guidelines.

A significant amount of multifamily development in the city has been approved as part of Specific Plans and Master Development Plans. For example, most specific plans allow multi-family residential by right only requiring design review and site plan review. The City has facilitated development of new multifamily housing by including the approval of multifamily development as part of the approval process for Specific Plans or Master Development Plans.

Permit Processing Timing

Table HE-63 summarizes the City's estimated processing times, approval bodies and typical number of hearings for City approvals that may be required in the residential development process. These processing times are typical for California cities. Processing times vary but, generally, are not necessarily dependent on the designated approval body. The thing that impacts development review is primarily the size and complexity of the project. Projects are reviewed for compliance with the City's ordinances and the completeness of the application. Table HE-64 summarizes the City's estimated processing times for City approvals that may be required in the single-family and multi-family residential development process. Not all steps identified in Table HE-64 apply to every project, Table HE-64 is representative of typical multifamily and single-family projects occurring in zones where these types of development are a permitted use, which is the majority of zones allowing residential development in the city.

To provide an efficient permit processing system, the City has implemented the following time and cost saving developmental processes:

- Prepared permit processing guidelines to assist residential builders in applying for development permits for single-family residences, multi-family residential developments and subdivisions.
- Located all City divisions involved in the permitting process in one central location.
- Developed a pre-application process to identify issues as soon as possible and reduce processing time. No fee is required for this service.
- Provided a GIS application on the City's website with land use information and links to important planning documents such as General Plan and Development Code.
- Encouraged concurrent processing of applications.
- Assigned a point-person and liaison to facilitate communication and timely inter-agency review of development projects.
- Established electronic plan check review services and on-line access to permit forms and applications.

Table HE-63: Community Development/ Planning Division Schedule of Residential Processing Times

Stockton, 2023

RESIDENTIAL APPROVALS	APPROXIMATE PROCESSING TIME (WEEKS)	APPROVAL BODY AND TYPICAL NUMBER OF HEARINGS
Rezonings and Pre-zonings	12-18	City Council – 2 hearings
Special Use Permits, Use Permits Requiring Public Hearings and Use Permits on 14-Day	6-10	Planning Commission – 1 hearing
Planned Unit Residential Development Permits	6-8	Planning Commission – 1 hearing
Amendment to The Stockton Municipal Code, Specific Plan or General Plan	12-24	City Council – 2 hearings
Tentative Maps 4 Lots or Less	6-8	City Engineer. No hearings required
Tentative Maps Over 4 Lots	6-8	City Council – 1 hearing
Variance/Waiver, Interpretation or Appeal of a Decision of The Community Development Director	4-6	Planning Commission – 1 hearing
Appeals to City Council	4-6	City Council – 1 hearing
Design Review	1-4	Non-discretionary administrative – Planning Staff (no hearing) Limited Discretion – Director (no hearing unless request is made for ARC review) Discretionary – Director, Planning Commission or City Council depending on project type. 1 hearing if heard by Planning Commission or City Council
Environmental Documentation	Varies	City Council – number of hearings depends of type of environmental review required

Source: City of Stockton, 2023.

Table HE-64: Residential Approvals Required for Typical Permitted Residential Projects

Stockton, 2023

RESIDENTIAL APPROVALS	SINGLE FAMILY APPROXIMATE PROCESSING TIME (WEEKS)	MULTI-FAMILY APPROXIMATE PROCESSING TIME (WEEKS)
Special Use Permits, Use Permits Requiring Public Hearings and Use Permits on 14-Day	6-10	N/A
Planned Unit Residential Development Permits	6-8	N/A
Amendment to The Stockton Municipal Code, Specific Plan or General Plan	12-24	N/A
Tentative Maps 4 Lots or Less	6-8	6-8
Tentative Maps Over 4 Lots	6-8	N/A
Design Review	1-4	1-4

Source: City of Stockton, 2023.

The typical amount of time between planning approval/entitlement and when an application for a building permit is submitted varies by project type and is determined by the applicant. Applicants have one year to act upon an entitlement and request a building permit. They can submit a request for a building permit as soon as 10 days following entitlement. Based on recent building permit data, a typical length of time is four to six weeks before submitting an application for a building permit. ADUs are allowed by-right and go straight to a building permit, unless they are in a Design District. In that case, they go to the Architectural Review Committee (which meets alternative weeks). Most single-family residential projects are also allowed by-right and go straight to building permit, unless in a Design District, then go to an Architectural Review Committee. Multifamily residential projects go to the Architectural Review Committee and require Site Plan Review (meetings are set as applications are received).

Design Review

The City has a design review process to encourage development that is compatible and harmonious with the design and use of surrounding properties and with the city in general. The following types of residential development are subject to the City's design review process:

- New single-family tract development in subdivision of five or more parcels;
- New single-family infill projects within special districts in historic areas with unique architecture;
- Additions and exterior remodeling of single-family dwellings within special districts visible from public right-of-way;
- New developments containing two or more dwelling units;
- Additions and exterior remodeling of existing multifamily projects; and
- Accessory structures in special districts or as part of a multifamily project greater than 120 square feet that are visible from the public right-of-way.

The City's adopted design guidelines are used by City staff, the Director, Architectural Review Committee (ARC), Cultural Heritage Board, Commission, and Council as adopted criteria for the review of development proposals.

The City's design review process is codified in Title 16 of the Stockton Municipal Code (Development Code). The procedure to be followed depends on whether discretionary approval is required from the Planning Commission or City Council (see Table HE-63). For projects that do not require any type of discretionary approval, the applicant is required to submit design review plans before building permit submittal. The Architectural Review Committee (ARC) is an internal design review consisting of a panel of three private-sector architects appointed by the Director. The ARC performs the design reviews on an alternating weekly schedule. Architectural Review Committee meetings are not open to the public. The ARC reviews the submitted plans for compliance with the design guidelines and/or applicable Development Code standards, and make recommendations and supporting findings in compliance with the list of recommendations. Following the ARC's review of the plans, the Director will prepare and transmit a list of the ARC's findings and recommendations to the applicant in a timely manner, noting that a request for reconsideration may be submitted, where applicable.

For projects that require a discretionary approval (e.g., Use Permit, rezoning), the applicant submits elevations of the proposed project at the time the discretionary application is submitted. The Director reviews the project for compliance with the land use and development regulations in the Development Code. The ARC reviews the overall design of the project for compliance with the design guidelines. In reviewing the design of the project, the ARC uses the design guidelines as a reference, and makes recommendations and supporting findings in the list of recommendations. Following the ARC's review of the plans, the Director prepares and transmits a list of the ARC's findings and recommendations to the applicant in a timely manner, noting that a request for reconsideration may be submitted and/or that the Planning Commission is the final Design Review Authority, where applicable.

Required Findings

The Review Authority shall determine whether a project adequately meets adopted City standards and the Guidelines, based on consistency with the following findings:

A. The proposed development is consistent with all applicable provisions of this Development Code and other applicable City ordinances;
B. The general design considerations, including the character, quality, and scale of design are consistent with the purpose/intent of this chapter and the Guidelines and other design guidelines that may be adopted by the City;
C. The architectural design of structures and their materials and colors are visually compatible with surrounding development. Design elements (e.g., awnings, exterior lighting, screening of equipment, signs) have been incorporated into the project to further ensure its compatibility with the character and uses of adjacent development, and/or between the different types of uses in a mixed-use development;
D. The location and configuration of structures are compatible with their sites and with surrounding sites and structures and do not unnecessarily block views from other structures or dominate their surroundings;
E. The general landscape design, including the color, coverage, location, size, texture, and type of plant materials, provisions for irrigation, planned maintenance, and protection of landscape elements have been considered to ensure visual relief, to complement structures, and to provide an attractive environment;

F. The design and layout of the proposed project will not interfere with the use and enjoyment of neighboring existing or future development and will not result in vehicular or pedestrian hazards;
G. The building design and related site plans, including on-site parking and loading, has been designed and integrated to ensure the intended use will best serve the potential users or patrons of the site; and
H. Special requirements or standards have been adequately incorporated, when applicable, into the building and/or site design (e.g., Americans with Disabilities Act regulations, historic preservation, mitigation measures, open space, utilities). (Prior code Section 16-515.060)

Senate Bill 330

Senate Bill (SB) 330, the Housing Crisis Act of 2019, established specific requirements and limitations on development application procedures. The bill allows housing developments for which a preliminary application is submitted that complies with applicable general plan and zoning standards is subject only to the development standards and fees that were applicable at the time of submittal. This applies to all projects unless the project square footage or unit count changes by more than 20 percent after the preliminary application is submitted. The developer must submit a full application for the development project within 180 days of submitting the preliminary application.

The City of Stockton offers a pre-application conference for any application for new development or redevelopment which is required to go before the Planning Commission and any subdivision map for five or more lots, to ensure that the applicant is aware of issues and requirements related to the project. Other departments and public agencies may be invited to attend a pre-application conference. The fee for the pre-application conference shall be in compliance with the City Council's most recently published fee schedule.

Currently, the City of Stockton does not have a process established for processing projects under SB 330; however, the City complies with state law regarding SB 330 using the state's form. The City has included Program 19 to establish a process that specifies the SB 330 process and standards for eligible projects.

Senate Bill 35

Currently, the City of Stockton does not have a process established for processing projects under SB 35; however, the City complies with state law regarding SB 35. The City has included Program 16 to establish a process that specifies the SB 35 streamlining approval process and standards for eligible projects.

Summary

Processing and permit procedures have not been found to be a constraint in Stockton. However, Program 17 commits the City to review and update the findings for use permits and Design Review to be objective to further streamline development review.

DEVELOPMENT FEES AND OTHER EXACTIONS

As shown in **Table HE-66**, the City collects various fees from developers to cover the costs of processing permits and providing necessary services and infrastructure. Additional fees and/or time may be necessary for required environmental reviews, depending on the location and nature of a project. Certain residential projects that require General Plan amendments, Development Code changes, or other planning-related functions require fees in addition to those listed in the table. These required fees are usually needed for master plans in greenfield areas.

Planning and Building permit fees and applicable impact fees vary from project to project. **Table HE-66** shows fees for a "typical" project in Stockton with updated 2022-23 rates. Multifamily fees are based on a hypothetical 27-unit multifamily development on 1.48 acres. Single family fees are based on a hypothetical 3-bedroom 2-bath home 1,800 square footage home and the Building Data Valuation Data for a unit in the R-3 zone. Estimated fees in Stockton are $61,725 for the hypothetical 1,800 sq ft single-family unit and $33,028 for the hypothetical multifamily unit, including City fees, permit fees, as well as County fees and school district fees. Based on an estimate of typical costs to develop housing, including land cost and construction costs, planning and impact Fee's represent 10.7 percent of development fees for a single-family unit and 10.8 percent per unit for a 27-unit multi-family development in the City of Stockton.

Other impact fees for agriculture and open space are charged by the gross acre and designed to mitigate for the loss of productive land. The agricultural land mitigation fee, at $14,352 per gross acre for single-family units, and at $12,841 per gross acre for multifamily units, applies when development converts "important farmland" to private urban uses. The San Joaquin Council of Governments collects the San Joaquin County Multi-Species Habitat and Open Space Conservation Plan fee to mitigate the loss of important habitat and open space.

Table HE-65: Planning Fees

Stockton, 2022-2023

FEE CATEGORY	FEE AMOUNT
Subdivision Fees	
Tentative Maps - 4 Lots or Less	*$1,045.00*
Tentative Maps - 5 to 25 Lots – Base Fee	*$3,135.00*
Tentative Maps - 26 – 100 Lots	*$4,702.00*
Tentative Maps - 101 Lots or more	*$10,000 deposit; cost for recovery*
Vesting Tentative Map	*Actual Cost plus 25% Admin*
Minor Tentative Map Amendment	*$1,045.00*
Condominium Conversion	*$3,135.00*
Major Tentative Map Amendment	*$3,135.00*
Planned Development Permit	*$3,135.00*
Annexations/Reorganizations/Detachments	*$20,000 deposit; cost for recovery*
Annexation Sphere of Influence Amendment/Service Reviews	*$20,000 deposit; cost for recovery*
Historic Preservation District/Landmarks/Certificates/Demolitions	
Historic Preservation District Designation Change	*$1,045.00*
Certificate of Appropriateness	*$261.00*
Historic Demolition or Relocation Permit Application	*$261.00*
Historic Landmark or Site Designation Application	*$1,045.00*
Zoning Fees	
Rezoning and Prezoning	*$5,225.00*
Zoning Compliance/Confirmation	*$788.00*
Zoning Fees Development Agreement (Development Agreement Application)	
Development Agreement (DA) Application	*$5,225.00*
Major Amendment to Development Application	*$5,225.00*
Minor Amendment to Development Application	*$1,045.00*
Use Permits	
Temporary Activity Permits	*$104.00*
Minor Amendment of Use Permits	*$314.00*
Commission Use Permit	*$3,135.00*
Administrative Use Permits	*$1,045.00*
Home Occupation Permit	
Home Occupation Permit	*$26.00*
Land Development Permits Design Review, Other Development Plans	
Billboard Cap and Replace Review	*$1,045.00*
Design Review	*$1,045.00*
Design Review – Minor	*$157.00*
Land Development Permit/Site Plan Review	*$1,045.00*

FEE CATEGORY	FEE AMOUNT
Variance/Waiver Requests, Administrative Interpretations/Determinations	
Variance/Commission Waiver	*$3,135.00*
Appeal of Community Development Director Decision or Administrative Hearing Officer Decision	*$522.00*
Street Name Change	*$3,135.00*
Public Convenience and Necessity Letter	*$1,045.00*
Administrative Determinations/Exceptions/Waivers	*$1,045.00*
Administrative Hearing Fee	*$98.00*
Tree Removal	
Street Tree Removal Permit	*$261.00*
Heritage Oak Removal Administrative Fee – Permit for Removal	*$65.00*
Heritage Oak Removal Noticing Fee	*$112.00*
Heritage Oak Removal Independent Arborist Report Fee	*$84.00*
Appeal to City Council of Tree Permit Denial	*$378.00*
Environmental Assessments	
Initial Study/Negative Declaration	*$1,568.00*
Expanded Initial Study/Negative Declaration	*$3,135.00*
Addendum to Expanded Initial Study or Expanded initial Study/Negative Declaration	*25% of consultant contract*
Environmental Impact Report/Mitigate Negative Declaration	*25% of consultant contract*
Code/Plan Adoption and Amendments	
Amendment to the Stockton Municipal Code (Chapter XVI)	*$5,225.00*
Establishment of Design Review Overlay District and Historical Preservation District	*$5,225.00*
Amendment to General Plan	*$5,225.00*
Precise Road Plan Adoption and Amendments	
Adopt Precise Road Plan	*$5,225.00*
Major Amendment to Precise Road Plan	*$2,612.00*
Minor Amendment to Precise Road Plan	*$1,306.00*
Specific Plan Adoption and Amendments	
Adopt Specific Plan	*$20,00 deposit; cost for recovery*
Major Amendment to Specific Plan	*$20,00 deposit; cost for recovery*
Minor Amendment to Specific Plan	*$20,00 deposit; cost for recovery*
Specific Plan/Master Plan Implementation Surcharge	*0.02 of all Building permits within Specific/Master Plan/Planned Development Areas*
Land Use Master Development Plan (MX Zone) Plan Adoption and Amendments	
Adopt Master Development Plan (MX Zone)	*$20,000 deposit; cost for recovery*
Major Amendment to Master Plan	*$20,000 deposit; cost for recovery*
Minor Amendment to Master Plan	*$20,000 deposit; cost for recovery*
Specific Plan/Master Plan Consultant Services	*$10,000 deposit; cost for recovery*

Source: City of Stockton Planning Fees 2022-2023 Fiscal Year

Table HE-66: Development Impact and Planning-Related Fees

Stockton, February 2023

FEES	SINGLE-FAMILY UNIT[1]	27-UNIT MULTIFAMILY DEVELOPMENT[2]	
		TOTAL DEVELOPMENT	PER UNIT
Municipal Utilities Department Fees			
Water	$2,264.41	$49,766.67	$1,843.21
Sewer	$974.53	$2,133.76	$79.03
Delta Water Supply Project	$5,508.23	$29,359	$1,087.37
Water and Sewer Administrative Fee	$113.36	$1,816.52	$67.28
Total Municipal Utilities Department Fees	**$8,860.53**	**$83,075.82**	**$3,076.88**
Public Facilities and Services Fees			
Surface Water	$4,587	$41,793	$1,547.89
Park Land	$2,798	$46,224	$1,712
Public Works Residential Construction	$75.25	$75.25	$2.79
Agriculture Land Mitigation	$658.95	$25,682	$951.19
Air Quality	$187	$3,429	$127
City Office Space	$467.00	$10,557	$391.00
Community Recreation Center	$481.00	$10,935	$405.00
Fire Prevention Review Fee	N/A	$201	$7.44
Fire Station	$781	$17,766	$658
Libraries	$902	$20,547	$761.00
Police Station Expansion	$591	$13,419	$497
Street Improvements	$13,226	$260,712	$9,656
Traffic Signal	$110	$1,796	$66.50
Regional Transportation Impact	$8,106.52	$65,663	$2,431.95
Total Public Facilities and Services Fees	**$32,971**	**$518,798**	**$19,214.76**
Planning Fees			
Building Permit	$2,428.31	$35,629.43	$1,319.61
Building Plan Check	$1,019.89	$14,964.36	$554.24
General Plan Maintenance and Implementation	448.43	$7,786.24	$288.38
Site Plan Review	$1,045.00	$1,045.00	$38.70
Total Planning Fees	$4,941.63	**$59,425.03**	**$2,200.93**
Other Fees			
Fee Area - Administrative Fee[4]	$1,872.52	$18,157.94	$672.52
Strong Motion Instrumental Program (SMIP) Fee	$38.86	$674.81	$24.99
Technology Fee	$182.12	$2,672.21	$98.97
Capital Preservation Fee	$298.95	$5,190.83	$192.25
Green Building Fee	$11.96	$207.63	$8.00
Community Rating System Administration Fee (CRS)	$145.70	$2,137.77	$79.18
Total Other Fees	$2,550	**$29,041.18**	**$1,075.60**
TOTAL CITY FEES	$49,323.00	**$690,340.42**	**$25,568.16**
County and Special District Fees			
County Fee	$1,890	$64,800	$1,620
School District[3]	$10,512	$157,680	$5,840
TOTAL FEES	$61,725.00	**$912,820.42**	**$33,028.16**

FEES	SINGLE-FAMILY UNIT[1]	27-UNIT MULTIFAMILY DEVELOPMENT[2]	
		TOTAL DEVELOPMENT	PER UNIT
TOTAL COUNTY AND SPECIAL DISTRICT FEES	$12,402	$222,480	$7,460
Land Costs	$98,000	$337,162	$12,487
Construction Costs	$299,955	$5,109,831	$192,253
TOTAL DEVELOPMENT COST INCLUDING FEES	$459,680.00	**$6,400,813.42**	**$237,768.64**
STOCKTON FEES AS A PERCENT OF TOTAL COST	**10.7%**	**10.7%**	**10.8%**

Notes:
[1] Single-family unit fees are from the City of Stockton website fee estimator (October 2015), based on a new 1,800-square-foot single-family detached home within city limits with a valuation of $299,955 and a 0.75-inch water meter size.
[2] Multifamily fees are from City of Stockton, based on a 27-unit apartment building, on a 1.48-acre property with a structural valuation of $5,190,825 and a 2-inch water meter.
[3] School Fees are determined by the school district. Estimate is based on Stockton Unified School District fees. Single-family: $5.84/SF; multifamily: $5.84/SF.
[4] Public Facilities and Services Fees multiplied by the 3.5% administrative fee equals totals.
Source: City of Stockton Fee for 2022-2023 Fiscal Year, 2022

DENSITY BONUS

State law (Government Code Section 65915 et seq.) requires local governments to grant a density bonus to developers that agree to provide a specific percentage of affordable housing, senior housing, or childcare facilities for lower- or moderate-income households as part of an approved development. The law is revised nearly every year and has been expanding to apply to more projects and allow larger bonuses and more incentives and concessions over the years. The magnitude of the incentive depends on the total share of development that is designated affordable. Program 20 commits the City to updating their Density Bonus ordinance when needed for consistency with state law and to continue to update it regularly throughout the planning period as updates to state law are made. Chapter 16.40 of Stockton's Development Code describes the City's density bonus provisions. In addition to regulations to comply with State law, Chapter 16.40 includes additional bonuses beyond what is offered under state law. Tier 1 Supplemental Density Bonuses offer bonuses between 50 and 75% and Tier 2 Supplemental Density Bonuses offer bonuses between 75 and 100%. A project's eligibility for a Tier 1 or Tier 2 bonus are based on achieving eligibility points based on amount of affordable units, sustainable design (LEED certification, Cal Green, alternative energy), incorporation of adaptive reuse, or location in priority areas of the city including in the Downtown Core, a disadvantaged community, or federal qualified opportunity zone.

LOCAL ORDINANCES THAT IMPACT HOUSING SUPPLY

The City doesn't have ordinances regulating short-term rentals, inclusionary housing, nor growth management that would potentially impact long-term housing supply.

PROVISIONS FOR A VARIETY OF HOUSING TYPES

Multifamily

The Zoning Ordinance allows multifamily development by right in the RM, RH, CN, CO, CG, and CD zones, and conditionally in the CL zone and with a land use permit in the OS zone. The City has not approved any new construction residential projects at densities below those identified in the inventory.

Accessory Dwelling Unit

An accessory dwelling unit (ADU) is an additional self-contained living unit, either attached to or detached from the primary residential unit on a single lot. It has cooking, eating, sleeping, and full sanitation facilities. ADUs can be an important source of affordable housing since they can be constructed relatively cheaply and have no associated land costs. ADUs can also provide supplemental income to the homeowner, allowing seniors to remain in their homes, or moderate-income families to afford houses.

To encourage establishment of ADUs on existing developed lots, notwithstanding subdivisions state law requires cities and counties to either adopt an ordinance based on standards set out in the law authorizing creation of ADUs in, to allow ADUs on lots zoned residential or mixed-use zone subject to ministerial approval ("by right") if they meet standards set out by law.

The City of Stockton meets State requirements for ADUs. The City of Stockton allows ADUs in all zoning districts that allow residential development. The Review Authority issues a ministerial building permit for an ADU or junior accessory dwelling unit (JADU) without discretionary review or a hearing, consistent with the development standards and State law. The City of Stockton is in compliance with state ADU law. Program 6 commits the City to continue updating their ADU regulations to stay consistent with state law and commits the City to promoting the development of ADUs as a housing type in the city.

Manufactured Homes and Mobile Home Parks

Sections 65852.3 and 65852.4 of the California Government Code specify that a jurisdiction shall allow the installation of manufactured homes on a foundation on all "lots zoned for conventional single family residential dwellings." Except for architectural requirements, the jurisdiction is only allowed to "subject the manufactured home and the lot on which it is placed to the same development standards to which a conventional single family residential dwelling on the same lot would be subject." The architectural requirements are limited to roof overhang, roofing material, and siding material.

The only two exceptions that local jurisdictions are allowed to make to the manufactured home siting provisions are if: (1) there is more than 10 years difference between the date of manufacture of the manufactured home and the date of the application for the issuance of an installation permit; or (2) if the site is listed on the National Register of Historic Places and regulated by a legislative body pursuant to Government Code Section 37361. Section 69852.7 of the California Government Code specifies that mobile home parks shall be a permitted use on "all land planned and zoned for residential land use." However, local jurisdictions are allowed to require use permits for mobile home parks. The City of Stockton's Development Code defines mobile homes on a permanent foundation under the definition of "Single-family dwellings". Zones where this use is allowed are shown in Table HE-58. Additionally, mobile home parks are allowed in the Residential Low-Density (RL), Residential Medium-Density (RM), Residential High-Density (RH), General Commercial (CG), and Commercial Downtown (CD) districts with an Administrative Use Permit.

Section 16.80.210 of Stockton's Development Code provides specific development standards for mobile home parks, including a minimum of 20-foot setback for mobile home spaces, buildings, parking or recreational areas, and other structures from all property lines along public streets. Additionally, access to the mobile home park must be directly to a major arterial street or within 500 feet of freeway access ramps. Stockton's Municipal Code conforms to Government Code Section 69852.7.

Group Homes

State law requires group residential facilities of six or few persons to be considered a single-family dwelling for the purpose of any law or zoning ordinance related to residential property use (California Health and Safety Code Sections 1267.8, 1566.3, 1568.08). As of 2022, licensed care homes consisting of six or fewer individuals are allowed by right in the RL, RM, RH, CD, and PF zones. However, these are not all the zones that allow single-family development; the RE zone also allows single-family dwellings by right. The Housing Element includes Program 17 to amend the Development Code to allow group homes for six persons or fewer in the RE zone.

Family care homes with more than six individuals require the approval of a Commission Use Permit in the RE, RH, and CD zones, and a land development permit in the PF zone. The Commission Use Permit process is the only restriction to family care homes with more than six individuals. Group homes in single-family or two-family structures are exempt from Title 24 requirements. The Commission Use Permit has not been used to deny a family care home of seven or more individuals in Stockton. According to the Health and Safety Code Sections 1267.8, 1566.3, and 1568.08, residential care facilities with seven or more must be allowed without a use permit. To ensure compliance with State law, the City has incorporated Program 17 to address this part of the statute.

Farmworkers and Employee Housing

State law asserts that employee housing for six persons or less shall be allowed in the same way residential structures are allowed in zones allowing residential uses and that employee housing for up to 12 units or 36 beds shall be deemed an agricultural use and must be subject to the same regulations as any other agricultural use in the same zone. "No Conditional Use Permit, zoning variance, or other zoning clearance shall be required of this employee housing that is not required of any other agricultural activity in the same zone" (Employee Housing Act, California Health and Safety Code Sections 17021.5 and 17021.6). Farm labor housing is considered an agricultural activity and is permitted by right in all zones allowing agricultural uses, which complies with State law (Health and Safety Code Section 17021.6). Program 17 is included to update the Development Code to allow employee housing for six persons or less in the same way residential structures are allowed in zones allowing residential uses.

Emergency Shelters

SB 2, passed in 2007 and in effect as of January 1, 2008, amended State Housing Element law (California Government Code Sections 65582, 65583, and 65589.5) regarding shelter for homeless persons. This legislation requires local jurisdictions to strengthen provisions for addressing the housing needs of homeless persons, including the identification of a zone or zones where emergency shelters are allowed as a permitted use without a use permit or other discretionary approval. Assembly Bill (AB) 2339, passed in 2022 and in effect as of January 1, 2023, expands the requirements for allowing emergency shelters under State law to ensure sufficient space on sufficient sites in suitable locations are identified in each jurisdiction.

California Health and Safety Code Section 50801(e) and Government Code Section 65583(a)(4) define "emergency shelters" as:

> Housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay." Emergency shelters include interim interventions, including, but not limited to, a navigation center, bridge housing, and respite or recuperative care.

The City of Stockton's Development Code defines homeless shelters as:

> A public or private building which provides immediate, short-term shelter that may involve supplemental services for more than six homeless individuals or family members without compensation.

Emergency shelters are allowed in the Residential High-Density, Commercial Office, Commercial General, and Commercial Downtown with a Commission Use Permit. The Development Code does not place any further restrictions or requirements. The City also allows emergency shelters "by right" (i.e., without a Commission Use Permit or other discretionary approval) in the Industrial Limited (IL), Industrial General (IG), and Public Facilities (PF) districts. While the IL and IG zones allow industrial uses, the zones are reserved for operations that are totally conducted indoors. The PF zone allows numerous other residential uses, including single-family homes and multifamily units, and is therefore suitable for emergency shelters. There are over 19 acres of vacant land on at least 22 parcels within Stockton city limits zoned IL, IG, or PF (as of 2024). All analyzed parcels are vacant. About 1.7 acres of this land is within the Greater Downtown area, where there is convenient access to social services and public transportation. The 19 plus acres of vacant land on 22 parcels is made up of a variety of parcel sizes ranging from .01 acres up to 9.1 acres. Only 3 of the parcels are smaller than .10 acres. Details are shown in the table below.

APN	ACRES	ZONING DISTRICT
16528054	1.70	IL
16355058	0.06	PF
16302041	5.11	IG
15529024	0.13	IL
15304015	0.17	IL
15304014	0.17	IL
15304013	0.17	IL
15304012	0.17	IL
15303024	0.18	IL
15303023	0.18	IL
15303004	0.12	IL
15303003	0.12	IL
15303002	0.12	IL
15112061	0.01	PF
14907040	0.09	IG
14713007	0.84	IG
14713001	0.31	IG
14710104	0.11	IL
14710103	0.11	IL
14710102	0.23	IL
14530011	0.25	IL
11736013	9.10	IG
	19.45	

However, only one of these parcels is in the PF zone which allows residential uses. In order to ensure there are sufficient suitable locations for emergency shelters in zones that allow residential uses, the City has analyzed vacant sites in the Residential High-Density, Commercial Office, Commercial General, and Commercial Downtown zoning districts as candidate areas. As shown in Figures HE-22 a and b in the Assessment of Fair Housing chapter, areas of the city in these four zoning districts are spread out geographically presenting the opportunity to allow emergency shelters on sites meeting the suitability criteria listed further down in this section. The following vacant parcels are available in these zoning districts:

- Residential High-Density – 61 vacant parcels totaling more than 116 acres. The size of the parcels ranges from .04 to 50.0 acres. The sizes break down further as follows:
  - Less than .1 acre – 12 parcels
  - Between .1 to .25 acres – 28 parcels
  - Between .25 to .5 acres – 7 parcels
  - Between .5 to 1 acre – 1 parcel
  - Between 1 and 5 acres – 9 parcels
  - Between 5 and 50 acres – 4 parcels
- Commercial Office – 42 vacant parcels totaling more than 23 acres. The size of the parcels ranges from .04 to 8.9 acres. The sizes break down further as follows:
  - Less than .1 acre – 3 parcels
  - Between .1 to .25 acres – 27 parcels
  - Between .25 to .5 acres – 4 parcels
  - Between .5 to 1 acre – 2 parcels
  - Between 1 and 8.9 acres – 6 parcels
- Commercial General – 275 vacant parcels totaling more than 317 acres. The size of the parcels ranges from .02 to 55.8 acres. The sizes break down further as follows:
  - Less than .1 acre – 33 parcels
  - Between .1 to .25 acres – 117 parcels
  - Between .25 to .5 acres – 38 parcels
  - Between .5 to 1 acre – 35 parcels
  - Between 1 and 5 acres – 40 parcels
  - Between 5 and 55 acres – 12 parcels
- Commercial Downtown – 111 vacant parcels totaling more than 37 acres. The size of the parcels ranges from .04 to 3.7 acres. The sizes break down further as follows:
  - Less than .1 acre – 21 parcels
  - Between .1 to .25 acres – 61 parcels
  - Between .25 to .5 acres – 12 parcels
  - Between .5 to 1 acre – 11 parcels
  - Between 1 and 3.7 acres – 6 parcels

The city has 893 persons without nighttime shelter as of the 2022 Point-in-Time (PIT) Count. The size of shelters in Stockton is based on building and fire code allowances and there is no maximum number of beds. Government Code Section 65583(a)(4)(I) requires a minimum of 200 square feet per person to meet the unsheltered need. To address the unsheltered needs of 893 people, this would be a minimum of 184,200 square feet or 4.2 acres, a number far smaller than the number of vacant acres in the four zoning districts.

The City will amend the Development Code to allow emergency shelters without discretionary review on enough suitable parcels in these zoning districts to address the 893 person need within one year of adoption of the Housing Element (see Program 17).

The additional sites where emergency shelters are allowed without discretionary review will meet the following criteria:

- Sites must allow residential uses.
- Sites must be located near amenities and services that serve people experiencing homelessness.
- Sites owned by the local government can be included if the analysis demonstrates that the sites will be made available for emergency shelters during the planning period, are suitable for residential use, and are located near amenities that serve people experiencing homelessness.

The City's municipal code determines the maximum number of beds for an emergency shelter by Building and Fire Codes. Development standards for emergency shelters are:

A. **Separation Between Structures.** Developments with multiple structures shall provide a 12-foot separation between those structures.

B. **Physical Characteristics.**

1. Compliance with applicable State and Local Uniform Housing and Building Code requirements.
2. The facility shall have on-site security during all hours when the shelter is open.
3. Facilities shall provide exterior lighting on pedestrian pathways and parking lot areas on the property. Lighting shall reflect away from residential areas and public streets.
4. Facilities shall provide secure areas for personal property.

C. **Maximum Number of Beds per Facility.** The maximum number of beds per facility shall be determined and as allowed by Building and Fire Codes.

D. **Limited Terms of Stay.** The maximum term of staying at an emergency shelter is six months in a consecutive 12-month period.

E. **Parking.** The emergency shelter shall provide off-street parking at a ratio of two spaces per facility for staff plus one space per 10 occupants allowed at the maximum capacity.

F. **Emergency Shelter Management.** A management plan is required for all emergency shelters to address management experience, good neighbor issues, transportation, client supervision, client services, and food services. Such plan shall be submitted to and approved by the Director prior to operation of the emergency shelter. The plan shall, at minimum, identify the property owner's and operator's names and contact information, on-site security, and anti-loitering measures. The plan shall include a floor plan that demonstrates compliance with physical standards of this chapter. The operator of each emergency shelter shall annually submit the management plan to the Director with updated information for review and approval. The City Council may establish a fee by resolution to cover the administrative cost of review of the required management plan.

G. **Waiting Area.** To prevent queuing of shelter residents off-site, an on-site intake waiting area shall be provided that is adequate to accommodate all incoming residents.

H. **Proximity.** The proximity of an emergency shelter next to another emergency shelter shall be at minimum 300 feet.

In addition, Government Code 65583(a)(4) (SB 2) requires sufficient parking to accommodate all staff working in the emergency shelter provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone. Currently, the code requires providing off-street parking at a ratio of two spaces per facility for staff plus one space per 10 occupants allowed at the maximum capacity. In addition, other standards, including the proximity standard, need to be updated for consistency with State law. The City has included Program 15 to revise the standards to ensure compliance with State law.

Low-Barrier Navigation Center

Government Code Section 65662 requires that the development of Low-Barrier Navigation Centers be developed as a use by right in zones where mixed uses are allowed or in nonresidential zones that permit multifamily

housing. For a navigation center to be considered "low barrier," its operation should incorporate best practices to reduce barriers to entry, which may include, but are not limited to, the following:

- Permitting the presence of partners if it not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth
- Pets
- Ability to store possessions
- Providing privacy, such as private rooms or partitions around beds in a dormitory setting or in larger rooms with multiple beds

The City defines a Low-Barrier Navigation Center as housing-first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. A low-barrier navigation center development is a use by right in special purpose or commercial zoning districts permitting multifamily dwellings.

Transitional Housing

While SB 2 added specific new requirements for local governments to meet in terms of planning for emergency shelter facilities, Government Code Section 65583(a)(5) also states that "transitional housing and supportive housing shall be considered a residential use of property, and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone." State law requires cities and counties to allow transitional and supportive housing in all zones that allow residential uses.

Transitional housing is designed to assist homeless individuals and families in moving beyond emergency shelter to permanent housing. California Health and Safety Code Section 50675.2(h) defines "transitional housing" and "transitional housing development" as:

> Buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months.

The City of Stockton's Development Code defines transitional housing as a "use by right" that shall have the same meaning as defined in subdivision (i) of Government Code Section 65583.2. The Government Code section reads "transitional housing and supportive housing are permitted in all zones allowing residential uses and are not subject to any restrictions (e.g., occupancy limit) not imposed on similar dwellings (e.g., single family home, apartments) in the same zone in which the transitional housing and supportive housing is located." Therefore, supportive housing is allowed in the city wherever single-family and multifamily residential is allowed. The City's code does not constrain development of transitional housing.

Supportive Housing

Supportive housing is permanent rental housing linked to a range of support services designed to enable residents to maintain stable housing and lead fuller lives. Typically, a portion of the housing is targeted to people who have risk factors such as homelessness or health challenges such as mental illness or substance addiction. Supportive housing comes in all shapes and sizes. It could be a renovated motel offering furnished co-living apartments; a multifamily development where tenants with disabilities live alongside other families with low incomes; a small, more service-intensive building; or scattered-site apartments. Whatever the configuration, all of the housing allows tenants to access support services that enable them to live as independently as possible.

California Health and Safety Code Section 65582(f) defines "supportive housing" as:

> Housing with no limit on length of stay, that is occupied by the target population, and that is linked to onsite or offsite services that assist the tenant to retain the housing, improve his or her health status, maximize their ability to live and, when possible, to work in the community.

Government Code Section 6565 (a)) requires cities and counties to consider supportive housing as a residential use allowed in all zones that allow residential uses and mixed use and only subject to those restrictions that apply to other residential uses of the same type in the same zone.

Additionally, supportive housing must be permitted by-right in multifamily, mixed-use, and nonresidential zones allowing multifamily.

The City of Stockton's Development Code defines supportive housing as a "use by right" that shall have the same meaning as defined in subdivision (i) of Government Code Section 65583.2. The Government Code section reads:

> Transitional housing and supportive housing are permitted in all zones allowing residential uses and are not subject to any restrictions (e.g., occupancy limit) not imposed on similar dwellings (e.g., single family home, apartments) in the same zone in which the transitional housing and supportive housing is located.

Therefore, supportive housing is allowed in the city wherever single-family and multifamily residential is allowed.

The City's code does not constrain development of supportive housing and is in compliance with the requirements of AB 2162.

Single-Room Occupancy Units

SRO units (referred to in Stockton as co-living units) can provide affordable housing for lower-income individuals, seniors, and persons with disabilities, and can serve as an entry point into the housing market for formerly homeless people. A co-living unit is usually small, between 200 to 350 square feet.

Co-living units are a source of affordable housing in the city. As the city of Stockton has aged, downtown hotels serving overnight visitors became residential hotels, or co-living units, renting rooms by the day, week, or month to very low-income individuals or couples. According to the City of Stockton, as of 2023, there were five residential hotels operating in the downtown central business district of Stockton.

There are a number of residential hotels that are currently vacant due to habitability, housing, and other code violations. It is unlikely that these hotels will be reopened and operated as hotels as there is significant work needed to get the residential hotels operational for overnight accommodations. The City has acquired some of these hotels to create housing, such as the Medici Artist Lofts. There is a mix of one-, two-, and three-bedroom apartments that include both affordable and market-rate units. The City has also created additional parking that is needed in downtown Stockton to create an environment conducive to commercial and retail businesses and development. The City performs annual inspections of the remaining residential hotels to make sure that these hotels meet minimum health and safety standards.

The Stockton Development Code defines Co-Living (dwelling unit facilities) as "a permanent housing facility consisting of single-room occupancy units, where each bedroom is considered a separate living quarter to be occupied by permanent residents." The City allows SROs in CG (Commercial General) and CD (Commercial Downtown) zones with an Administrative Use Permit.

HOUSING FOR PERSONS WITH SPECIAL NEEDS

Housing for Persons with Disabilities

State housing element law requires jurisdictions to analyze potential and actual constraints on the development, maintenance, and improvement of housing for persons with disabilities and demonstrate local efforts to remove governmental constraints that hinder the locality from meeting the need for housing for persons with disabilities. In accordance with SB 520 (Chapter 671, Statutes of 2001), the City has analyzed the potential and actual governmental constraints on the development of housing for persons with disabilities. Program 14 commits the City to include a State-compliant definition of family in the glossary in the zoning regulations.

Accessibility

The City does not provide any undue or additional constraints to the development, maintenance, and improvement of housing for persons with disabilities. The City of Stockton uses Title 24 building laws in its development of zoning, permitting processes, and building codes for disabled housing with no additional building codes adopted. The City makes every effort to ensure accessibility for persons with disabilities. The City is stringent in its application of Title 24 guidelines and requires all new development to meet the requirements of the law. No additional requirements for parking are required other than those for the zone in which the housing

is being developed, and special concessions can be given to lower the parking requirements for special-needs housing.

The Building and Housing Board of Appeals deals with disputes that may arise with special-needs housing. Where issues do arise, citizens, contractors, and others can seek assistance from the City's Building and Housing Board of Appeals. Although the Building and Housing Board of Appeals cannot waive Title 24 requirements, the Board can make findings on the use of alternative methods and/or materials to accommodate disabled access. As of 2023, the application fee required for filing with the Building Board of Appeals is $373.

The City of Stockton process to retrofit homes for accessibility follows Title 24 guidelines.

The City of Stockton Building Division enforces Chapter 11 of the California Building Code, Title 24. The Code provides a mandate that 100 percent of ground-floor (one-story) dwelling units in buildings consisting of three or more dwelling units be accessible by adaptability. Adaptability includes such features as wheelchair clearances in bathrooms, hallways, and kitchen areas, adjustable lowered countertops, site access, backing for grab bars in shower/bath areas, etc. The disabled tenant, or tenant's representative, at time of occupancy, can request of the property owner that the adaptable provisions be converted to full accessibility. Building permit fees associated with the Title 24 improvements would be the only fees the City would impose as part of this process.

Reasonable Accommodation

The City adopted a reasonable accommodation ordinance in 2016, Zoning Ordinance Chapter 16.214, to establish a formal procedure for individuals with disabilities seeking equal access to housing to request reasonable accommodation in the application of the City's land use and zoning standards, regulations, policies, and procedures and to establish criteria for evaluating the requests. An application for reasonable accommodation must be submitted on a form prescribed by the Director, or in the form of a letter addressed to the Director. If the project for which the application for reasonable accommodation is being made requires approval of another permit under this title, then the applicant must file the application for reasonable accommodation together with the application for the other permit, for concurrent review and action.

The decision to grant, grant with modifications, or deny an application for reasonable accommodation is based on a finding, all of which are required for approval or conditional approval of a reasonable accommodation:

1. Whether the housing or housing-related facilities that are the subject of the request will be used by an individual with a disability under the Americans with Disabilities Act (ADA).
2. Whether the request for reasonable accommodation is necessary to make specific housing available to an individual with a disability under the ADA.
3. Whether the requested reasonable accommodation would impose an undue financial or administrative burden on the City.
4. Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a City program or law, including, but not limited to, land use and zoning.
5. Whether the requested reasonable accommodation would be contrary to the public health, safety, or welfare, or be injurious to the property or improvements of adjacent properties.
6. Whether the requested reasonable accommodation adequately considers the physical attributes of the property and structures.
7. Whether alternative reasonable accommodations could provide an equivalent level of benefit.

Program 29 proposes to remove two of the findings above that are part of the City's Reasonable Accommodation approval process for consistency with State law:

- Whether the requested reasonable accommodation adequately considers the physical attributes of the property and structures.
- Whether alternative reasonable accommodations could provide an equivalent level of benefit.

POTENTIAL NONGOVERNMENTAL CONSTRAINTS

The availability and cost of housing is strongly influenced by market forces over which local governments have little or no control. Nonetheless, State law requires that the Housing Element contain a general assessment of these constraints, which can serve as the basis for actions to offset their effects. The primary nongovernmental constraints to the development of new housing in Stockton are the availability of financing and development costs.

AVAILABILITY OF FINANCING

Interest rates are determined by national policies and economic conditions, and there is little that local governments can do to affect these rates. Jurisdictions can, however, offer interest rate write-downs to extend home purchase opportunities to lower-income households. In addition, government-insured loan programs may be available to reduce mortgage down-payment requirements.

The cost of borrowing money to finance the construction of housing or to purchase a house affects the amount of affordably priced housing in Stockton. First-time homebuyers are the group most impacted by financing requirements. Higher interest rates increase a homebuyer's monthly payment and decrease the range of housing that a household can afford. Lower interest rates result in a lower cost and lower monthly payments for the homebuyer.

As shown in **Figure HE-36**, interest rates steadily increased nationwide between 2015 and 2017, increasing 0.2 and 0.3 percent year-over-year for a 30-year fixed-rate mortgage. Interest rates decreased in 2018 and began increasing again in 2019. During the start of 2020, interest rates dropped to a historic low and rose in 2022. As shown in **Figure HE-37**, in 2022, the increases in interest rates month-to-month were as high or higher than the year-over-year increases from 2015 to 2017. Interest rates peaked at 7.0 percent for a 30-year fixed-rate mortgage and 6.3 percent for a 15-year fixed-rate mortgage.

Interest rates are currently higher than they have been since 2008. When interest rates rise, the market typically compensates by decreasing housing prices. Similarly, when interest rates decrease, housing prices begin to rise. There is often a lag in the market, causing housing prices to remain high when interest rates rise until the market catches up. Lower-income households often find it most difficult to purchase a home during this time period.

Figure HE-36: Historical Mortgage Rates
United States, January 2015-January 2021

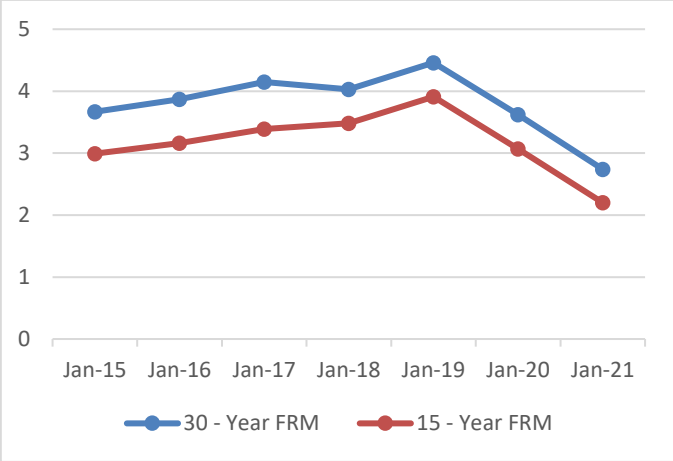
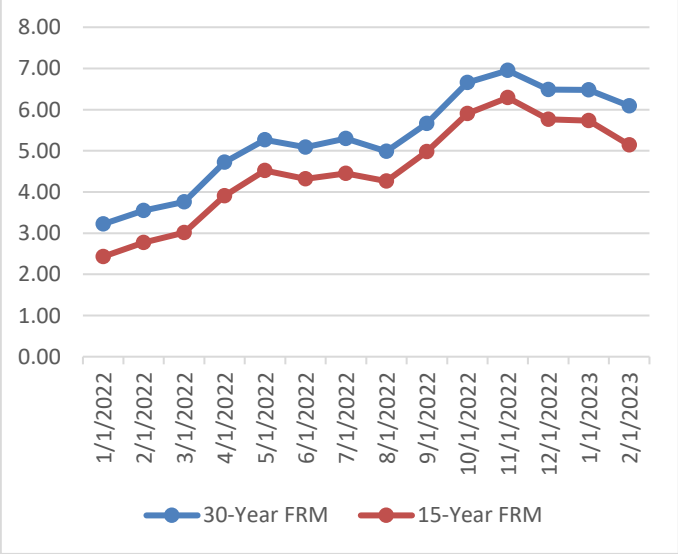


Figure HE-37: Mortgage Rates
United States, January 2022 – February 2023



Mortgage Rates: FRM- Fixed Rate Mortgage
Source: Freddie Mac Primary Mortgage Market Survey, 2022.

DEVELOPMENT COSTS

Land Costs

Costs associated with the acquisition of land include both the market price of raw land and the cost of holding the property throughout the development process. Land acquisition costs can account for over half of the final sales price of new homes in small developments and in areas where land is scarce.

The main determinant of land value is market demand. Builders will pay a premium for residential land in a strong market when expected buyers are plentiful. Raw residential land sold for well over per acre with no site improvements in Stockton.

The market is improving and land values are beginning to rise as a result. Based on a recent (December 2022) survey in Stockton, the average price per acre was $213,100. The survey was based on residential sites listed on Redfin.com, an online real estate database. The median lot size was 3.08 acres. There was a wide variety of locations for the land listed from infill sites, established suburbs, and a few greenfields on the outskirts of the city.

Construction Costs

Housing construction costs can act as a constraint to the affordability of new housing. However, the cost of construction varies with the type, size, location, and amenities of the development. "Entry-level" homes have far fewer amenities than other higher-priced custom homes. The Craftsman Book Company is a resource that provides construction cost estimates for specific geographic areas by ZIP code. According to the Craftsman Book Company's 2022 estimates, construction costs for a single-family home are approximately $151 per square foot. This is based on costs calculated for a 2,000-square-foot, wood-framed, single-story, four-cornered home, of good quality construction and including a two-car garage and forced-air heating/cooling in Stockton. Estimated total construction costs for such a home are $302,248. These construction costs include labor, materials, and equipment but do not include costs of buying land.[2] The increased use of prefabricated factory-built or manufactured housing, which is permitted in all residential districts throughout the city (consistent with California State law), may provide for lower-priced housing by reducing construction and labor costs.

According to the Craftsman Book Company's 2022 estimates costs for multifamily construction are approximately $121 per square foot. This is based on costs calculated for a three-story building in Stockton with 40 units and an average unit size of 1,000 square feet each. The calculation is for a wood or light steel frame structure, including forced air heating and cooling and constructed of good quality materials. The estimated total construction costs for each unit are $104,573, and total construction costs for the building are $4,420,124. These construction costs include labor, materials, and equipment but do not include costs of buying land or off-street parking.[1] Additionally, the City received a job value estimate with construction costs for a 27-unit multifamily three-story residential building. The one-bedroom, 27-unit project estimates construction costs at $192,253 per unit.

Although the economy is currently fairly strong some builders are still reluctant to start new construction projects because of construction costs and interest rates are on the rise. There is little that the City can do to mitigate the impacts of high construction costs except by avoiding local amendments to uniform building codes that unnecessarily increase construction costs without significantly adding to health, safety, or construction quality. Because construction costs are similar in the city to those in other Central Valley areas, the cost of construction alone is not considered a major constraint to housing production.

Available Dry Utilities

Dry utilities, including cable, electricity, and telephone service, are available to all areas within the city.

- Electricity: Pacific Gas and Electric Company
- Mobile Coverage: AT&T and Comcast

[2] 2022 National Building Cost Manual and 2022 952-02,03,04,05,07, 09, and 10 zip code modifiers, Craftsman Book Company.

7 EVALUATION

The following section reviews and evaluates the City's progress in implementing the 2015-2023 Housing Element. This section analyzes and effectiveness of policies and programs for the previous Housing Element planning period. This section also contains recommendations for program changes to address housing needs for the 2023-2031 planning period.

During the 2015-2023 Housing Element planning period, the City completed or embarked on multiple major long-range planning projects including the General Plan Update, Climate Action Plan, zoning consistency work, and Comprehensive Development Code update. The Shape Stockton efforts are currently underway which include this Housing Element Update, Housing Action Plan, Neighborhood Action Plans as well as the Comprehensive Development Code Update. The City also experienced the impacts of the COVID-19 pandemic.

The City implemented many of the programs it hoped to accomplish during the 2015-2023 planning period, but some programs did not move forward as much as expected. In addition, state law regarding housing has changed substantially since the adoption of the 2015-2023 Housing Element. This evaluation focuses on maintaining the programs that will be most effective to meeting housing needs and adding programs that address the updates to state law. **Table HE-67** below provides a detailed review of progress towards implementation of the 2015-2023 Housing Element programs. The element must also provide a cumulative evaluation of the effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness).

- In 2021, the City applied for HomeKey funds and received a total of $4,752,284. Of the $4,752,284, about $4,072,280 were used towards the rehabilitation of a 15-unit apartment complex for victims of domestic violence. The rest of the funds ($680,004) were allocated to Town Center Studios, a 40-unit permanent supportive housing solution that works to end homelessness for Stockton residents.
- To ensure safe and habitable emergency shelters and facilities, the City allocated funding towards the rehabilitation of the Gospel Center Rescue Mission, the Community Medical Centers building, and the Women's Center Youth & Family Services facilities and the restrooms at Oak Park, and the acquisition, construction, and rehabilitation funding for temporary or transitional shelters.
- During the 5th planning cycle, the City allocated a total of $65,880 in CDBG funds towards the Disability Resource Agency for Independent Living

(DRAIL) as well as Community Center for the Blind and Visually Impaired (CBVI).

- Between 2017 and 2021, the City of Stockton consistently received CDBG, HOME and ESG funds totaling approximately 44.3 million in funds. These funds have been allocated towards gap financing for affordable housing developers, Single-Family Repair Loan Program, Single-Family Emergency Repair Program. As well as supporting fair housing activities and funding local emergency shelters homeless services, rapid re-housing, and rental assistance service.
- Sierra Vista, located in south Stockton, south of Dr. Martin Luther King Jr. Boulevard (formerly Charter Way), is home to approximately 274 families. To maintain the affordability of the Sierra Vista apartments, the City committed two million dollars to phase two of redevelopment.
- To provide housing and supportive services to special-needs households and individuals the City of Stockton's allocated a total $17,407,480 in Homeless Assistance Program (HHAP) and Permanent Local Housing Assistance program (PLHA) funds.

Table HE-67: Review of 2015-2023 Housing Element Programs

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
Program 1: Adequate Sites Monitoring Adequate Sites Monitoring: The City shall biennially update its vacant land inventory, including an updated inventory of potential infill sites (smaller vacant and underutilized parcels). The City shall make the updated inventory available to the public and development community via the City's website.	The City continuously updates its website to maintain its vacant and underutilized parcel list. Economic Development and Community Development staff continue to be responsible for updating the vacant/underutilized database with vacant/underutilized parcel list.	Continue, combine with Program 2
Program 2: No Net Loss Zoning For any downzoning or project approval for fewer housing units and/or at lower densities than assumed in the Housing Element, the City shall make findings that there is still adequate capacity to meet the remaining housing need, consistent with "no-net-loss" zoning law (AB 2069).	The City reviews all rezoning applications and conducts No Net Loss findings, when appropriate, as required by Government Code Section 65683.	Continue, combine with Program 1
Program 3: Settlement Agreement Implementation The City shall develop a comprehensive housing strategy to meet the housing targets identified in the Settlement Agreement. The comprehensive strategy shall include measures to enable development of 4,400 residential units in the Greater Downtown Area by 2035. Potential strategies could include adopting less restrictive zoning in the Downtown and Greater Downtown or expanding the Commercial Downtown (CD) zoning district to allow greater densities in the Greater Downtown.	The City continuously promotes the successful completion of its agreed-upon number of required affordable housing units as outlined in the City's (Affordable) Settlement Agreement. During the planning period, the City gained 261 new units, of which 174 units are affordable units, with these 6 completed housing projects in the Greater Downtown: 1. Cal Weber, completed in 2016, 40 affordable units 2. Veteran's Anchor Village, completed in 2018, 51 units 3. Medici Artist Lofts, completed in 2019, 34 units 4. Liberty Square (formerly Hunter Street Apartments), completed in 2022, 74 affordable units 5. Grand View Village, to be completed in 2023, 75 affordable units 6. Crossway Residences, multiple sites completed in 2020 and 2021, 41 units of affordable supportive housing Another completed project outside of the Greater Downtown is: 1. Sierra Vista Phase I and Phase II, completed in 2020, 215 affordable units In 2020, the City updated its Five Year Consolidated Plan, describing the City's plan to create additional affordable units. The City also completed San Joaquin Community Response to Homelessness Strategic Plan with the goal of	Modify and continue

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
	enabling over 200 new units of permanent housing by 2025. *The City is drafting a Housing Action Plan (HAP) concurrently with its 6th Cycle Housing Element, with anticipated completion in 2023. The HAP is funded by a Local Early Action Planning (LEAP) grant.* *In addition, remaining obligations under the settlement agreement shifted with the City's adoption of the Climate Action Plan in 2014 and the General Plan update in 2018.* *The City has taken several other actions already, including parking reductions for housing (zero off-site required quarter mile of ACE Cabral Station), increased residential densities in the Greater Downtown area, streamlined multifamily housing applications – multifamily is now allowed by-right, fee waivers, and Community Development Block Grant (CDBG) funding for downtown infill infrastructure.*	
Program 4: Public Facilities Repair and Replacement *Through implementation of the Consolidated Plan, and upon funding availability, the City shall continue to identify and target low-income neighborhoods for the expansion of existing facilities/infrastructure, replacement of deteriorating facilities, and construction of new facilities/infrastructure to increase quality of life for Stockton residents.*	*Since the 2015-2016 fiscal year (FY), the City has funded more than 30 public facility projects with CDBG funds. In the 2018-2019 FY, the City allocated $900,000 in CDBG funds for the Downtown Infrastructure Infill Incentive Program. In the 2021-2022 FY, the City continued to fund the Downtown Infrastructure Infill Incentive Program, as well as rehabilitated the sleeping quarters and bathroom at the Gospel Center Rescue Mission, the Community Medical Centers building, and the Women's Center Youth & Family Services facilities, which serve domestic violence victims and homeless youth, renovated the restrooms at Oak Park, and the acquisition, construction, and rehabilitation funding for temporary or transitional shelters.*	*Continue*
Program 5: Study Fee Deferral Program for Affordable Housing *The City shall develop a program for consideration of adoption by the City Council to defer fees for affordable housing until certificate of occupancy.*	*The Affordable Housing Nexus and Linkage Fee report was prepared in 2020-2021. The City decided to not continue to phase two, which would have been adoption of a fee deferral program, as the housing market, which was already causing housing costs to skyrocket, couldn't handle an added fee. It didn't make sense to add a new fee and still encourage construction. The City is drafting a Housing Action Plan (HAP) concurrently with its 6th Cycle Housing Element, with an anticipated completion date of March 2023. The HAP is funded by a LEAP grant.*	*Delete*

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
Program 6: Coordination with the Housing Authority of San Joaquin County *The City shall continue to work closely with the Housing Authority of San Joaquin County in providing assisted housing through the Housing Voucher Program (Section 8), and in providing housing and supportive services to special needs households and individuals.*	*The City continuously works with the Housing Authority of San Joaquin County in providing Housing Choice Vouchers to residents. In 2017, 54 of the Conway Homes received permits for rehabilitation. In 2018, the City committed two million dollars to phase two of the Sierra Vista apartments, which included 115 new units. The City approved the distribution of funding from the Housing and Homeless Assistance Program (HHAP) (in 2020 and 2021) and the Permanent Local Housing Assistance program (PLHA) (in 2021) to provide housing and supportive services to special-needs households and individuals.* *Three rounds of HHAP funding have been released. The City of Stockton's current allocations total $17,407,480:* • *Round 1: $6,460,266* • *Round 2: $3,053,944* • *Round 3: $7,893,270* *Round 1 and Round 2 funds have been received and are in the process of being disbursed to homeless service providers and affordable housing developers to meet a variety of needs, including shelter expansions and operations and new permanent housing projects.* *On June 21, 2022, the City approved a multi-year spending plan for HHAP funds and authorized the submission of the HHAP Round 3 application. On September 4, 2022, CAL ICH approved the City's request for HHAP Round 3 funds; however, the formal agreement to accept and appropriate funds is still in process.*	*Continue and expand to address Assembly Bill (AB) 686, including promoting voucher use in high and moderate resource areas (as identified by the California Tax Credit Allocation Committee (TCAC)/HCD).*
Program 7: State and Federal Funding *The City shall continue to apply annually for Federal entitlement funds under the CDBG, HOME and ESG Programs, and shall pursue additional State and Federal funding that becomes available during the planning period. The City shall support housing organizations and affordable housing developers by assisting in applications for funding, drafting letters of support and resolutions, and identifying potential sites for affordable housing.*	*Funding sources are evaluated annually. In the 2017-2018 fiscal year (FY), the City of Stockton received a total of $5,533,127 from the United States Department of Housing and Urban Development (HUD), the following are the entitlement allocations:* • *CDBG - $3,451,760* • *HOME - $1,190, 818* • *ESG - $283,028* • *Special "extra: allocation - $607,521* *In FY 2018-2019, the City received a total of $5,501,322 from HUD, the following are the entitlement allocations:* • *CDBG - $3,451,760* • *HOME - $1,759,186*	*Continue*

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
	• *ESG - $290,376* *In FY 2019-2020, the City received a total of $5,234,705 from HUD, the following are the entitlement allocations:* • *CDBG - $3,329,801* • *HOME - $1,612,015* • *ESG - $292,889* *In FY 2020-2021, the City received a total of $16,240,671 from HUD, the following are the entitlement allocations:* • *CDBG - $3,427,828* • *HOME - $1,593,808* • *ESG - $292,582* • *CDBG CARES Act funding - $1,859,563* • *CDBG CV 1 - $2,016,786* • *ESG CV1/CV2 - $7,050,104* *In FY 2021-2022, the City received a total of $11,822,452 from HUD, the following are the entitlement allocations:* • *CDBG - $3,388,867* • *HOME - $1,760,529* • *HOME ARPA - $6,380,677* • *ESG - $292,379* *The City also received Redevelopment Successor Agency Repayments to CDBG every year, portions of which were allocated to the Housing Loan Pool.* *The distribution of funds varies and are as follows: HOME funds are allocated as gap financing for affordable housing developers through an annual competitive application process. CDBG funds are used for the Single-Family Repair Loan Program, the Single-Family Emergency Repair Program, and to support housing organizations, such as San Joaquin Fair Housing. ESG funds are allocated to local emergency shelters homeless services, rapid re-housing, and rental assistance services.* *In 2021, the City applied for or received funding from a number of State and federal funding sources, including REAP, HomeKey, PLHA, and HHAP.* • *-HHAP $17,407,480* • *-REAP (SJCOG) $621,150*	

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
	• -HomeKey-2 (2022 - Villa D' Flore) $4,072,280 • -HomeKey-1 (Town Center Studios) $680,004 • -PLHA $10,268,580 ($2,053,716/yr over 5 yrs) • -LEAP (HCD) $750,000 • -REAP 2.0 (SJCOG NOFA coming soon)	
Program 8: Continue to Operate Down Payment Assistance Program *The City shall continue to administer its Down Payment Assistance Program for low-income first-time homebuyers using a variety of funding sources including CDBG and HOME funds.*	*The City continues to operate the Down Payment Assistance Program, which lends up to $10,000 in assistance, or 5 percent of the purchase price plus the closing costs and accessibility repairs for persons with physical impairments. No loans were awarded between 2017 and 2023. In 2022, the City decided to merge this program with the Home Key program.*	*Combine with Program 7 and continue*
Program 9: Priority Sewer and Water Service for Affordable Housing *The City shall adopt policies and procedures to provide priority sewer and water service for developments that include lower income housing units, consistent with State law (Government Code Section 65589.7).*	*The City intends to implement this program as part of the currently underway Development Code Update.*	*Continue*
Program 10: Inclusionary Housing Evaluation *The City shall conduct a study to investigate the feasibility of an Inclusionary Housing Program. The study shall include an analysis of the potential options and requirements, such as the appropriate percentage of affordable units, income eligibility criteria, methods by which developers could meet the requirements, appropriate resale restrictions on ownership units, and time frame for affordability of units. Based on the findings of the study, the City Council shall consider adoption of an inclusionary housing program, as appropriate.*	*In 2020, the City contracted with consultants to conduct a study for the feasibility of an Inclusionary Housing Program. This study was completed in 2021. The study concluded that the current market in the city doesn't support an inclusionary requirement. Further consideration of a voluntary inclusionary requirement or potential inclusion of affordable units as part of development agreements are being considered by the city moving forward.*	*Delete*
Program 11: Infill Strategy *The City shall develop a strategy to facilitate the development of infill projects in the Downtown and Greater Downtown Areas. The Infill Strategy shall identify actions and incentives to promote infill development. These strategies and incentives could include allowing less restrictive height limits, setbacks, and parking requirements; planning infrastructure improvements; and streamlining the permitting process.*	*The Downtown Infrastructure Infill Incentive Program, approved in 2015, provides financial incentives to eligible parties in developing new market-rate residential, commercial, or mixed-use projects in Downtown Stockton. This program will expire in 2025, unless extended by the City Council.* *During the 2018-2019 fiscal year (FY), The City allocated $900,000 in CDBG funds for the Downtown Infrastructure Infill Incentive Program. Additionally, during the 2018-2019 FY, the City was awarded a $600,000 Environmental Protection Agency (EPA) Brownfields Assessment Grant in partnership with San Joaquin Council of Governments (SJCOG) and the City's Successor Agency. The City contracted with a consultant in 2019 to prepare*	*Continue*

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
	a Brownfields Site Revitalization Program. Assessment activities will continue to focus on the city's downtown and waterfront. The grant award is split evenly between evaluating sites with hazardous substances and petroleum contamination; it will be used to conduct six preliminary (Phase I) and five advanced (Phase II) environmental site assessments and to prepare an area-wide plan and three site-specific plans. Grant funds also will be used to update the site inventory, prioritize sites, and support community outreach activities. *Several of the zoning strategies have already been implemented as part of the 2020-2022 Phased Code update, and remaining items will also be implemented in the 2023 Code overhaul.*	
Program 12: Infill Site Assembly *The City shall actively work with local property owners and developers to assist in the consolidation and assembly of small infill parcels for residential projects, particularly as it related to parcels listed in the sites inventory and parcels with multiple owners. The City shall process lot mergers ministerially, and shall offer incentives, such as expedited processing, in addition to the incentives already offered to infill development.*	*The City continued to look for opportunities to work with and assist local property owners and developers in the consolidation and assembly of small infill parcels for residential projects, but not many consolidations occurred. As specified in Stockton Municipal Code Section 16.200.030, lot consolidation requests are processed ministerially. The City is updating infill requirements in the Development Code as part of the Comprehensive Development Code Update. The City is also working on mapping potential infill sites that are vacant and ready for development as part of the Housing Action Plan, current underway.*	*Continue*
Program 13: Development Outside Infill Areas *The City shall submit for City Council adoption amendments to the General Plan to ensure that development outside City limits as of the effective date of the Settlement Agreement does not occur in a manner that is out of balance with infill development (i.e., development within existing city limits). These proposed amendments shall include measures limiting the granting of entitlements for projects (i.e., specific plan, master plan, or other projects of significance) outside the City limits until firm, effective milestones that will assure that specified levels of infill development, jobs-housing balance goals, and greenhouse gas (GHG) and vehicle miles traveled (VMT) reduction goals, once established, are met. As part of this process, the City shall consider the impacts on the cost, supply, and affordability of housing.*	*The City adopted its 2040 General Plan in 2018. It includes goals and actions on greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) that stem from the City's Climate Action Plan (CAP) and will continue to be implemented through entitlement and the Capital Improvement Plan (CIP) projects review. This Plan includes these actions:* • ***Action LU-6.1F:*** *Evaluate and implement adjustments to the Public Facilities Fee (PFF) structure to encourage development in areas where infrastructure is already present and ensure that non-infill development pays its fair share of anticipated citywide capital facilities and operational costs.* • ***Action LU-6.2A:*** *Develop and implement an infill incentive program that encourages infill development through expedited permitting,*	*Delete*

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
	changes in fee structures, prioritizing infrastructure improvements in infill areas, property owner and/or landlord incentives to maintain property and reduce blight, and/or other strategies. As part of this program, the City defines and prioritizes categories of infill types based on land use and residential density or nonresidential intensity. • ***Action LU-6.2B:*** *Ensure prioritization of development and redevelopment of vacant, underutilized, and blighted infill areas be considered through strategies such as zoning changes and strategies to avoid gentrification.* • ***Action LU-6.5A:*** *Require preparation of a fiscal impact analysis for large development projects and annexations to ensure a full accounting of infrastructure and public service costs and require fiscal mitigations when necessary.* *As part of this program, the City defines and prioritizes categories of infill types based on land use and residential density or nonresidential intensity.*	
Program 14: Development Code Amendment for Compliance with State Law *The City shall amend the Development Code to allow care homes for six persons or fewer in the RE zone to fully comply with State law, which requires State licensed group homes for six or fewer to be treated as a single family home.*	*This program was completed in 2020. However, state law has changed and new requirement will need to be addressed.*	*Combine with Program 15 and modify to address current State law*
Program 15: Review Development Code Standards for Possible Revision *Following the Comprehensive General Plan Update, the City shall review and evaluate the Development Code for consistency and shall explore ways to maximize housing opportunities on small lots. Possible changes to the Development Code might include:* • *Reducing the minimum lot area required for a PUD or the possibility of creating an alternative zoning designation for smaller lot developments of less than 2 acres. The purpose of this alternative zoning designation would be to allow different development standards to permit higher densities in infill areas.*	*Since adoption of the 2040 General Plan in 2018, the City has amended the Development Code in two phases to remove AUP requirements for high multifamily residential development citywide, allow accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) with flexible development standards, reduce or eliminate parking for specific housing developments, maximized local Density Bonuses to allow 100% bonuses, and increased allowable densities. The City completed additional amendments related to Zoning Map and General Plan inconsistencies in a third phase in 2022.* *The City is partway through a Comprehensive Development Code Update. Completion is anticipated in 2023.*	*Modify to remove completed items, add any new State law requirements. The modified program will be implemented through the currently underway Comprehensive Development Code Update.*

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
• *Reviewing site development standards to see if there are ways to use space more effectively in order to develop more units and usable open space.* • *Only permitting single-family homes within RM and RH zones for isolated parcels that cannot feasibly be developed in a more intense fashion.* • *Reviewing development standards for homes on small lots (e.g., reduced setbacks, parking, yard requirements).* • *Removing the AUP requirement for high density residential development in the Greater Downtown.* • *Reducing the minimum lot area required for a PUD or the possibility of creating an alternative zoning designation for smaller lot developments of less than 2 acres. The purpose of this alternative zoning designation would be to allow different development standards to permit higher densities in infill areas.*		
Program 16: Monitor Article 34 Authorization *The City shall request voter approval on a future ballot for its Article 34 Authorization, which expires in 2020. Thereafter, the City shall annually monitor the number of remaining units allowed under its Article 34 authorization and schedule a new election when needed to limit the lack of authorization as a constraint to the development of affordable housing.*	*Measure K, which required a simple majority, passed with 74.86% of the electorate participating in the 2018 election. The election results were ratified by the Stockton City Council at the regularly scheduled meeting on December 18, 2018. The City continues to monitor the remaining number of units authorized. SCA-2 was signed into law in 2022, which will place a repeal of Article 34 on the 2024 California ballot.*	*Delete*
Program 17: Fiscally-Positive Impact Fees *The City shall develop and adopt impact fees on new development or other ongoing funding mechanisms (e.g., community facilities districts) in accordance with State law to ensure that all development outside the existing City limits as of the effective date of the Settlement Agreement (i.e., non-infill areas) is fiscally-positive to the City. Specific details of the fee structure shall be determined as part of the comprehensive strategy for implementing the Settlement Agreement. As part of this process, the City shall consider the impacts on the cost, supply, and affordability of housing and ensure that fees do not unduly constrain housing development.*	*Approved in 2018, the Greater Downtown Stockton Residential Development Public Facilities Fees (PFFs) Exemption Program provides a waiver for certain PFFs for all new residential development within the Greater Downtown Stockton area. The Citywide Affordable Housing Development Public Facilities Fees Exemption Program provides an exemption for certain PFFs for new affordable housing developments within city limits. For other developments that do not qualify under these two programs, the City's Stockton Economic Stimulus Plan (SESP) provides a fee reduction for single-family and multifamily residential projects and a 50% fee reduction for commercial and industrial projects within city limits. The SESP Program will expire when the City completes the Master Infrastructure Plans and PFF Nexus Study, and*	*Modify and continue*

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
	when the new fees are in effect. The City is considering modifying this program to only address multi-family projects.	
Program 18: Preserve At-Risk Units *The City shall continue to work with owners of "at-risk" projects to discuss the timing of a possible sale and potential sales price. The City shall ensure owners have met the tenant noticing requirements as set forth in California Government Code Sections 65863.10 and 65863.11. The City shall contact non-profit housing providers that work in the Stockton area to see if any are interested in acquiring and rehabilitating "at-risk" projects. Assuming there is interest, the City shall provide technical assistance as needed and funding as available to these housing providers.*	*During the 5th Housing Element Cycle, there were four affordable housing projects with a total of 552 units at risk of conversion prior to December 31, 2025:* • *Steamboat Landing (150 units, 2023)* • *Village East (190 units, 2022)* • *Hammer Lane Village (130 units, 2017)* • *Silvercrest (82 units, 2016)*	*Continue and update to comply with current State law*
Program 19: Housing Rehabilitation Programs *The City shall continue to administer its owner-occupied loan program and emergency repair program using a variety of funding sources including CDBG and HOME*	*The City continues to administer its owner-occupied rehabilitation loan program and emergency repair program, including the Single-Family Loan Program and the Single-Family Emergency Repair Program. The City*	*Continue*
Program 20: Code Enforcement Programs *The City shall continue to inspect housing units in targeted areas to check for building code violations. In situations where properties cannot be rehabilitated, the City will continue to enforce the removal and replacement of substandard units.*	*The City continued to inspect housing units in targeted areas to check for building code violations throughout the planning period.*	*Continue*
Program 21: Neighborhood Stabilization Program Funds *The City shall use the remaining Neighborhood Stabilization Program funds to rehabilitate foreclosed properties.*	*The program's funds were used to purchase and rehabilitate foreclosed properties. In 2017, the City acquired and/or rehabilitated six apartment complexes.*	*Delete*
Program 22: Point-in-Time Homeless Count *The City shall continue to participate in the countywide Point-in-Time homeless count to determine the number and characteristics of both sheltered and unsheltered homeless in San Joaquin County.*	*The City collaborated with the San Joaquin Continuum of Care (CoC) for the 2019 Point-in-Time Count (PIT). The City continues to work with the CoC to determine the appropriate time to conduct the next PIT homeless count, considering the circumstances of the COVID-19 pandemic. This effort will continue but this program does not need to be included in the Housing Element so will be deleted.*	*Delete*
Program 23: Continue to Support Organizations Assisting Homeless Persons *Continue to Support Organizations Assisting Homeless Persons: The City shall annually apply for and continue to pursue State and Federal funds available to the City, private donations, and volunteer assistance to support*	*The City has received ESG funds from HUD every year since 2016, as detailed earlier in this table. The City allocates ESG funds to local emergency shelter homeless services, rapid re-housing, rental assistance services, and the Homeless Management Information System (HMIS). As part of the 2020-2025 Consolidated Plan update*	*Continue*

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
homeless shelters. The City shall continue to provide financial assistance from its Emergency Solutions Grant (ESG) funding to homeless service providers and continue to support additional development of shelter facilities as requested by shelter providers. In addition, the City shall review the need for additional shelter facilities and services when it updates its Consolidated Plan.	*completed in 2020, the City reviewed and acknowledged the need to support the acquisition, rehabilitation, or construction of emergency shelter facilities.*	
Program 24: Reasonable Accommodation Public Outreach *The City shall prepare public information brochures and website information on reasonable accommodations for disabled persons and translate the materials to provide information to residents with language barriers, The City shall make this information available at the public counter and distribute the materials to community groups and organizations that represent persons with disabilities.*	*All City-funded affordable housing projects and supportive service programs affirmatively further fair housing by marketing the projects/programs to those least likely to apply. The marketing materials are forwarded to agencies that target individuals with disabilities, homeless persons, and low-income households of various ethnicities and backgrounds.*	*Continue, combine with Program 27*
Program 25: Continue to Assist the Disabled in Community Development Block Grant Project Areas *The City shall continue to include special provisions for housing the disabled in CDBG project areas, including mobility grants for homes (e.g., Emergency Repair Program) and handicapped accessibility features.*	*The City funded the Disability Resource Agency for Independent Living (DRAIL) with $30,000 allocated in CDBG funds in the 2018-2019 fiscal year (FY) and $15,000 in the 2019-2020 FY. The City also provided $7,550 in the 2019-2020 FY and $13,330 in the 2020-2021 FY of CDBG funding to the Community Center for the Blind and Visually Impaired (CBVI).*	*Continue*
Program 26: Assist Farm Workers *The City shall continue to provide ongoing assistance to farm laborers by working with the San Joaquin Housing Authority, San Joaquin County, agricultural employers, farm labor housing advocates, and the development community to develop affordable, decent housing for farm workers.*	*The City continued to work with the San Joaquin Housing Authority, San Joaquin County, agricultural employers, farm labor housing advocates, and the development community to identify opportunities to develop affordable, decent housing for farm workers.*	*Continue*
Program 27: Housing for Persons with Developmental Disabilities *The City shall work with the Valley Mountain Regional Center to implement an outreach program that informs families within the city on housing and services available for persons with developmental disabilities. The program could include the development of an informational brochure, posting information on the City's website, and/or conducting workshops.*	*The City continued to work with the Valley Mountain Regional Center to implement an outreach program.* *The City has provided capital and operating funding to nonprofit developers to encourage the development of new housing for persons with disabilities, including those with developmental disabilities, and for the improvement of existing housing units occupied by persons with disabilities. There hasn't been as much funding for this type of project in recent years.*	*Continue, combine with Program 24*
Program 28: Analysis of Impediments to Fair Housing *The City shall review and update its Analysis of Impediments to Fair Housing Report every five years.*	*The City updated its Analysis of Impediments to Fair Housing Report in 2020.*	*Combine into a new fair housing program and continue*

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
Program 29: Fair Housing Referrals and Brochures The City shall continue to provide funds from its CDBG Program to San Joaquin County Fair Housing to provide fair housing counseling and education and outreach efforts to city residents. In addition to providing contact information for San Joaquin Fair Housing on the City's website (under the Housing Division), the City shall continue to make referrals to Fair Housing as issues/cases come to the City's attention. The City shall also work with Fair Housing to periodically review and update fair housing brochures that are provided to the public and posted to the City's website. The City shall distribute fair housing information at City offices, the library, community centers, and other community facilities.	The City continuously provided CDBG funding to San Joaquin County Fair Housing. The City continued to coordinate with San Joaquin County Fair Housing and provided resources and contact information on the City's website. Staffing resource limitations have prevented additional accomplishments under this program.	Continue and expand to address AB 686
Program 30: Property Assessed Clean Energy (PACE) Program. The City shall continue to provide programs for property owners to finance the purchase and installation of infrastructure improvements to their properties with no up-front costs for: renewable energy, energy and water efficiency improvements, water conservation upgrades, and/or electric vehicle charging.	The City continued to offer the Property Assessed Clean Energy (PACE) Program.	Continue
Program 31: Green-Up Stockton The City shall continue to encourage voluntary energy assessments for existing housing units built prior to November 1, 2002. The City shall continue to work with community services agencies and PG&E and other funding sources to identify funding and incentivize residential energy efficiency projects.	The City continued to encourage voluntary energy assessments for existing housing units.	Continue
Program 32: Weatherization Activities The City shall advertise local weatherization programs by posting information on the City website and distributing fliers and brochures, and shall refer elderly homeowners, low-income households within certain income limits, and the general public, to agencies offering weatherization programs.	The City uses HUD funding for the owner-occupied Single-Family Repair Loan Program and the Single-Family Emergency Repair Program, which includes weatherization activities. The programs are advertised on the City's website.	Continue

PROGRAM	STATUS OF PROGRAM IMPLEMENTATION	RECOMMENDATION TO CONTINUE, MODIFY, OR DELETE
Program 33: Annual Housing Element Implementation Reporting *The City shall review and report annually on the implementation of Housing Element programs for the prior calendar year and present the annual report to the City Council at a public hearing before submitting the annual report to the Department of Housing and Community Development (HCD) and the Office of Planning and Research (OPR).*	*The City annually presents the Annual Housing Element report to the City Council at a public hearing.*	*Delete*
Program 34: Annual Staff Review *The City shall conduct annual staff meetings to review the City's progress in implementing the Housing Element and addressing housing issues, especially issues relating to affordable housing and special needs housing. The City shall use these meetings to coordinate Housing Element implementation with all City departments (e.g., Public Works, Fire, Police, Economic Development, and Recreation).*	*The City conducts annual staff meetings with departmental staff, particularly Economic Development (ED) and Community Development (CD), to communicate regularly on issues related to the Housing Element and addressing housing issues in Stockton. In 2020, CD staff launched an initiative, alongside ED, to create the City's first Housing Action Plan (HAP). The City is drafting it concurrently with its 6th Cycle Housing Element, with an anticipated completion date of March 2023. The HAP is funded by a Local Early Action Planning (LEAP) grant.*	*Delete*

APPENDIX A: LAND INVENTORY ANALYSIS

A

Table A-1: Sites Inventory

SITE #	ADDRESS	APN	CONSOLIDATED SITES	GENERAL PLAN	ZONING	MIN. DENSITY	MAX. DENSITY	PARCEL ACREAGE	REALISTIC CAPACITY MODIFIER	SITE STATUS	PUBLICLY-OWNED	IDENTIFIED IN PRIOR PLANNING CYCLE(S)	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE INCOME CAPACITY	TOTAL CAPACITY	NOTES	FEMA 500YR FLOOD	USACE 200YR FLOOD	FEMA 100YR FLOOD	DAM INUN-DATION
1-1	348 W MARKET ST STOCKTON CA 95203	13733001	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		5	6		Yes	No	No	Yes
1-2	338 W MARKET ST STOCKTON CA 95203	13733002	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		5	6		Yes	No	No	Yes
1-3	326 W MARKET ST STOCKTON CA 95203	13733003	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		5	6		Yes	No	No	Yes
1-4	318 W MARKET ST STOCKTON CA 95203	13733004	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		5	6		Yes	No	No	Yes
1-5	115 S MONROE ST STOCKTON CA 95203	13733020	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.73	0.4464	Vacant	YES - Special District-Owned	4th and 5th	6		38	44		Yes	No	No	Yes
1-6	248 W MARKET ST STOCKTON CA 95203	13733008	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.07	0.4464	Vacant	YES - Special District-Owned	5th	1		3	4		Yes	No	No	Yes
1-7	248 W MARKET ST && STOCKTON CA 95203	13733009	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.05	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		2	3		Yes	No	No	Yes
1-8	240 W MARKET ST STOCKTON CA 95203	13733010	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		5	6		Yes	No	No	Yes
1-9	226 W MARKET ST STOCKTON CA 95203	13733011	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		5	6		Yes	No	No	Yes
1-10	220 W MARKET ST STOCKTON CA 95203	13733012	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		5	6		Yes	No	No	Yes
1-11	214 W MARKET ST STOCKTON CA 95203	13733013	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.06	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		2	3		Yes	No	No	Yes
1-12	103 S MADISON ST STOCKTON CA 95202	13733014	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.09	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		4	5		Yes	No	No	Yes
1-13	115 S MADISON ST STOCKTON CA 95202	13733015	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.09	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		4	5		Yes	No	No	Yes
1-14	119 S MADISON ST STOCKTON CA 95202	13733016	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.17	0.4464	Vacant	YES - Special District-Owned	4th and 5th	2		8	10		Yes	No	No	Yes
1-15	125 S MADISON ST STOCKTON CA 95202	13733017	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.17	0.4464	Vacant	YES - Special District-Owned	4th and 5th	2		8	10		Yes	No	No	Yes
1-16	126 S MONROE ST STOCKTON CA 95203	13733018	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.15	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		8	9		Yes	No	No	Yes
1-17	124 S MONROE ST STOCKTON CA 95203	13733019	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.17	0.4464	Vacant	YES - Special District-Owned	4th and 5th	2		8	10		Yes	No	No	Yes
1-18	855 W WEBER AV STOCKTON CA 95203	14519003	Yes, 1-18 through 1-21	Commercial	CD(CORE)	20	136	1.97		Vacant	Yes - City Owned		10		56	66	South Pointe Site. Capacity based on RFP.	Yes	No	Yes	Yes
1-19	833 W WEBER AV STOCKTON CA 95203	14527006	Yes, 1-18 through 1-21	Commercial	CD(CORE)	20	136	3.73		Vacant	Yes - City Owned		18		105	123	South Pointe Site. Capacity based on RFP.	Yes	No	Yes	Yes
1-20	705 W WEBER AV STOCKTON CA 95203	14527009	Yes, 1-18 through 1-21	Commercial	CD(CORE)	20	136	3.08		Vacant	Yes - City Owned		15		87	102	South Pointe Site. Capacity based on RFP.	Yes	No	Yes	Yes
1-21	1 *UNASSIGNED STOCKTON CA 95203	14527010	Yes, 1-18 through 1-21	Commercial	CD(CORE)	20	136	0.29		Vacant	Yes - City Owned		2		7	9	South Pointe Site. Capacity based on RFP.	Yes	No	No	Yes
1-22	537 N ARGONAUT ST STOCKTON CA 95203	13525034		Medium Density Residential	RM	8.8	17.4	0.16	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
1-23	835 W FREMONT ST STOCKTON CA 95203	13544213		Commercial	CN(CORE)	20	136	0.12	0.4464	Vacant	NO - Privately-Owned			7		7		Yes	No	Yes	Yes
1-24	1 *UNASSIGNED STOCKTON CA 95203	13545029		Commercial	CD(CORE)	20	136	0.17	0.4464	Vacant	NO - Privately-Owned			10		10		No	No	Yes	Yes
1-25	1 *UNASSIGNED STOCKTON CA 95203	13545030		Commercial	CD(CORE)	20	136	0.17	0.4464	Vacant	NO - Privately-Owned			10		10		No	No	Yes	Yes
1-26	1 *UNASSIGNED STOCKTON CA 95203	13545032		Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	NO - Privately-Owned			6		6		No	No	Yes	Yes
1-27	433 N STOCKTON ST STOCKTON CA 95203	13545038		Commercial	CD(CORE)	20	136	0.12	0.4464	Vacant	NO - Privately-Owned			7		7		No	No	Yes	Yes
1-28	137 W OAK ST STOCKTON CA 95202	13719006		Administrative Professional	CO(CORE)	20	136	0.13	0.4464	Vacant	NO - Privately-Owned	4th and 5th		7		7		Yes	No	No	Yes
1-29	604 N COMMERCE ST STOCKTON CA 95202	13719021		Administrative Professional	CO(CORE)	20	136	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		10		10		Yes	No	No	Yes
1-30	528 N VAN BUREN ST STOCKTON CA 95203	13720204		High Density Residential	RH(CORE)	20	136	0.17	0.8	Vacant	NO - Privately-Owned	5th		18		18		Yes	No	No	Yes
1-31	522 N VAN BUREN ST STOCKTON CA 95203	13720217		Commercial	CN(CORE)	20	136	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
1-32	519 N LINCOLN ST STOCKTON CA 95203	13721408		Commercial	CG(CORE)	20	136	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		10		10		Yes	No	Yes	Yes

Notes: Prescribed densities within the CD, CG, CL, CN, CO and RH zones depends on whether a site is located in the downtown core, the greater downtown or outside of the downtown. For sites in these zones, the entries in the zoning column in the table include "Core" "Greater" or "Outside" to indicate the site's location. Those sites that have been previously identified in two or more consecutive planning periods and do not currently allow residential development by right are denoted in ***bold and italics***.

SITE #	ADDRESS	APN	CONSOLIDATED SITES	GENERAL PLAN	ZONING	MIN. DENSITY	MAX. DENSITY	PARCEL ACREAGE	REALISTIC CAPACITY MODIFIER	SITE STATUS	PUBLICLY-OWNED	IDENTIFIED IN PRIOR PLANNING CYCLE(S)	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE INCOME CAPACITY	TOTAL CAPACITY	NOTES	FEMA 500YR FLOOD	USACE 200YR FLOOD	FEMA 100YR FLOOD	DAM INUN-DATION
1-33	525 W FREMONT ST STOCKTON CA 95203	13721411		Commercial	CG(CORE)	20	136	0.33	0.4464	Vacant	NO - Privately-Owned	4th and 5th		20		20		Yes	No	Yes	Yes
1-34	530 W FREMONT ST STOCKTON CA 95203	13725011		Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	NO - Privately-Owned			6		6		No	No	Yes	Yes
1-35	504 W FREMONT ST && STOCKTON CA 95203	13725016		Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	NO - Privately-Owned			6		6		No	No	Yes	Yes
1-36	518 W FREMONT ST STOCKTON CA 95203	13725027		Commercial	CD(CORE)	20	136	0.29	0.4464	Vacant	NO - Privately-Owned			17		17		No	No	Yes	Yes
1-38	321 W WEBER AV STOCKTON CA 95203	13727023		Parks and Recreation	CD(CORE)	20	136	1.24	0.4464	Vacant	NO - Privately-Owned	5th		75		75		Yes	No	Yes	Yes
1-39	109 S VAN BUREN ST STOCKTON CA 95203	13736026	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.54	0.4464	Vacant	YES - Special District-Owned	4th and 5th	3		29	32		Yes	No	No	Yes
1-40	120 S LINCOLN ST STOCKTON CA 95203	13736027	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.3	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		17	18		Yes	No	No	Yes
1-41	401 W WASHINGTON ST STOCKTON CA 95203	13736028	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.13	0.4464	Vacant	YES - Special District-Owned	4th and 5th	2		5	7		Yes	No	No	Yes
1-42	102 S LINCOLN ST STOCKTON CA 95203	13736039	Yes, 1-1 through 1-17 and 1-39 through 1-42	Commercial	CD(CORE)	20	136	0.21	0.4464	Vacant	YES - Special District-Owned	4th and 5th	1		11	12		Yes	No	No	Yes
1-43	1 *UNASSIGNED STOCKTON CA 95203	13736058		Commercial	CD(CORE)	20	136	0.22	0.4464	Vacant	NO - Privately-Owned			13		13		Yes	No	No	Yes
1-46	625 N SAN JOAQUIN ST STOCKTON CA 95202	13906014		Commercial	CD(CORE)	20	136	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		10		10		Yes	No	No	Yes
1-47	613 N GRANT ST STOCKTON CA 95202	13922307		High Density Residential	CD(CORE)	20	136	0.13	0.4464	Vacant	NO - Privately-Owned	5th		7		7		Yes	No	No	Yes
1-48	622 N STANISLAUS ST STOCKTON CA 95202	13922312		High Density Residential	CD(CORE)	20	136	0.15	0.4464	Vacant	NO - Privately-Owned	4th and 5th		9		9		Yes	No	No	Yes
1-49	845 E OAK ST STOCKTON CA 95202	13922509		High Density Residential	CD(CORE)	20	136	0.23	0.4464	Vacant	NO - Privately-Owned	4th and 5th		13		13		Yes	No	No	Yes
1-50	831 E OAK ST STOCKTON CA 95202	13922510		High Density Residential	CD(CORE)	20	136	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
1-51	821 E OAK ST STOCKTON CA 95202	13922511		High Density Residential	CD(CORE)	20	136	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
1-52	815 E OAK ST STOCKTON CA 95202	13922512		High Density Residential	CD(CORE)	20	136	0.12	0.4464	Vacant	NO - Privately-Owned	4th and 5th		7		7		Yes	No	No	Yes
1-53	442 N SUTTER ST 404 STOCKTON CA 95202	13923001		Commercial	CD(CORE)	20	136	0.21	0.4464	Vacant	NO - Privately-Owned	4th and 5th		12		12		Yes	No	No	Yes
1-54	537 E LINDSAY ST STOCKTON CA 95202	13923018		Commercial	CG(CORE)	20	136	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		10		10		Yes	No	No	Yes
1-55	519 E LINDSAY ST STOCKTON CA 95202	13923021		Commercial	CG(CORE)	20	136	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
1-56	437 E MINER AV STOCKTON CA 95202	13924017		Commercial	CD(CORE)	20	136	0.35	0.4464	Vacant	NO - Privately-Owned	4th and 5th		21		21		Yes	No	No	Yes
1-57	206 N SUTTER ST STOCKTON CA 95202	13925003		Commercial	CD(CORE)	20	136	0.46	0.4464	Vacant	NO - Privately-Owned			27		27		Yes	No	No	Yes
1-58	532 E MINER AV STOCKTON CA 95202	13925008		Commercial	CD(CORE)	20	136	0.14	0.4464	Vacant	NO - Privately-Owned	5th		8		8		Yes	No	No	Yes
1-59	544 E MINER AV STOCKTON CA 95202	13925027		Commercial	CD(CORE)	20	136	0.23	0.4464	Vacant	NO - Privately-Owned	5th		13		13		Yes	No	No	Yes
1-60	621 E WEBER AV STOCKTON CA 95202	13927014		Commercial	CD(CORE)	20	136	0.8	0.4464	Vacant	NO - Privately-Owned	4th and 5th	48			48		Yes	No	No	Yes
1-61	814 CHANNEL ST STOCKTON CA 95202	13928012		Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	NO - Privately-Owned	5th		6		6		Yes	No	No	Yes
1-63	925 E MINER AV STOCKTON CA 95202	15111005		Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
1-64	128 N AURORA ST STOCKTON CA 95202	15115014		Commercial	CD(CORE)	20	136	0.11	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
2-1	1816 RIVER DR STOCKTON CA 95204	11131024		Low Density Residential	RL	0	8.7	0.53	0.8	Vacant	NO - Privately-Owned	4th and 5th		3		3		No	No	Yes	Yes
2-2	1819 PRINCETON AV STOCKTON CA 95204	11134006		Low Density Residential	RL	0	8.7	0.65	0.8	Vacant	NO - Privately-Owned	4th and 5th		4		4		No	No	Yes	Yes
2-3	1747 PRINCETON AV STOCKTON CA 95204	11134012		Low Density Residential	RL	0	8.7	0.25	0.8	Vacant	NO - Privately-Owned			1		1		No	No	Yes	Yes
2-4	2000 MARSHALL AV STOCKTON CA 95204	11709014		Institutional	RH(OUTSIDE)	17.5	30	6.75	0.8	Vacant	NO - Privately-Owned		162			162		Yes	No	No	Yes

Notes: Prescribed densities within the CD, CG, CL, CN, CO and RH zones depends on whether a site is located in the downtown core, the greater downtown or outside of the downtown. For sites in these zones, the entries in the zoning column in the table include "Core" "Greater" or "Outside" to indicate the site's location. Those sites that have been previously identified in two or more consecutive planning periods and do not currently allow residential development by right are denoted in ***bold and italics***.

SITE #	ADDRESS	APN	CONSOLIDATED SITES	GENERAL PLAN	ZONING	MIN. DENSITY	MAX. DENSITY	PARCEL ACREAGE	REALISTIC CAPACITY MODIFIER	SITE STATUS	PUBLICLY-OWNED	IDENTIFIED IN PRIOR PLANNING CYCLE(S)	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE INCOME CAPACITY	TOTAL CAPACITY	NOTES	FEMA 500YR FLOOD	USACE 200YR FLOOD	FEMA 100YR FLOOD	DAM INUN-DATION
2-5	2446 COUNTRY CLUB BL STOCKTON CA 95204	12304005		Low Density Residential	RL	0	8.7	0.28	0.8	Vacant	NO - Privately-Owned			1		1		No	No	Yes	Yes
2-6	2442 COUNTRY CLUB BL STOCKTON CA 95204	12304010		Low Density Residential	RL	0	8.7	0.57	0.8	Vacant	NO - Privately-Owned	4th and 5th		3		3		No	No	Yes	Yes
2-7	2433 CANAL DR STOCKTON CA 95204	12304049		Low Density Residential	RL	0	8.7	0.83	0.8	Vacant	NO - Privately-Owned	4th and 5th		5		5		No	No	Yes	Yes
2-8	2204 CANAL DR STOCKTON CA 95204	12330043		Low Density Residential	RL	0	8.7	0.32	0.8	Vacant	NO - Privately-Owned			2		2		No	No	Yes	Yes
2-9	2838 N CALIFORNIA ST STOCKTON CA 95204	12536021		Administrative Professional	CO(OUTSIDE)	17.5	30	1.39	0.4464	Vacant	NO - Privately-Owned	4th and 5th	18			18		Yes	No	No	Yes
2-10	453 HAMPTON ST STOCKTON CA 95204	12537015		Medium Density Residential	RM	8.8	17.4	0.16	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
2-11	557 E PINE ST STOCKTON CA 95204	12538008		Administrative Professional	CO(OUTSIDE)	17.5	30	0.12	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
2-12	539 E PINE ST STOCKTON CA 95204	12538010		Administrative Professional	CO(OUTSIDE)	17.5	30	0.15	0.4464	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
2-13	437 E PINE ST STOCKTON CA 95204	12538018		Administrative Professional	CO(OUTSIDE)	17.5	30	0.12	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
2-14	20 W WYANDOTTE ST STOCKTON CA 95204	12703036		Medium Density Residential	RM	8.8	17.4	0.13	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
2-15	1502 N EL DORADO ST STOCKTON CA 95204	12708018		Commercial	CG(OUTSIDE)	17.5	30	0.32	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
2-16	406 CHESTNUT ST STOCKTON CA 95204	12714018		Medium Density Residential	CO(OUTSIDE)	17.5	30	0.14	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
2-17	2121 N CALIFORNIA ST STOCKTON CA 95204	12716212		Administrative Professional	CO(OUTSIDE)	17.5	30	0.11	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
2-18	2031 N CALIFORNIA ST STOCKTON CA 95204	12717121		Administrative Professional	CO(OUTSIDE)	17.5	30	0.11	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
2-19	420 CHESTNUT ST STOCKTON CA 95204	12718022		Medium Density Residential	CO(OUTSIDE)	17.5	30	0.11	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
2-20	417 E WALNUT ST STOCKTON CA 95204	12718029		Medium Density Residential	CO(OUTSIDE)	17.5	30	0.11	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
2-21	415 E WALNUT ST STOCKTON CA 95204	12718030		Medium Density Residential	CO(OUTSIDE)	17.5	30	0.11	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
2-22	411 E WALNUT ST STOCKTON CA 95204	12718031		Medium Density Residential	CO(OUTSIDE)	17.5	30	0.12	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
2-23	409 E WALNUT ST STOCKTON CA 95204	12718032		Medium Density Residential	CO(OUTSIDE)	17.5	30	0.14	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
2-24	1811 MARSHALL AV STOCKTON CA 95205	12728034		Low Density Residential	RL	0	8.7	3.39	0.8	Vacant	NO - Privately-Owned			23		23		Yes	No	No	Yes
2-25	1 *UNASSIGNED STOCKTON CA 95203	13319038		Low Density Residential	RM	8.8	17.4	0.2	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
2-26	2177 MONTE DIABLO AV STOCKTON CA 95203	13323068		Medium Density Residential	RM	8.8	17.4	0.15	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
2-27	1852 SHIMIZU DR STOCKTON CA 95203	13346006		Low Density Residential	RL	0	8.7	0.26	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
2-28	1002 N YOSEMITE ST STOCKTON CA 95203	13539314		Commercial	CN(GREATER)	20	90	0.12	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
2-29	340 W HARDING WY STOCKTON CA 95204	13708001		Commercial	CG(GREATER)	20	90	0.32	0.4464	Vacant	NO - Privately-Owned	4th and 5th		12		12		Yes	No	No	Yes
2-30	320 W HARDING WY STOCKTON CA 95204	13708002		Commercial	CG(GREATER)	20	90	0.18	0.4464	Vacant	NO - Privately-Owned			7		7		Yes	No	No	Yes
2-31	133 W MAGNOLIA ST STOCKTON CA 95202	13712211		High Density Residential	RH(GREATER)	20	90	0.1	0.8	Vacant	NO - Privately-Owned			7		7		Yes	No	No	Yes
2-32	17 W MAGNOLIA ST STOCKTON CA 95202	13712410		High Density Residential	RH(GREATER)	20	90	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		7		7		Yes	No	No	Yes
2-33	747 N CENTER ST STOCKTON CA 95202	13718028		High Density Residential	RH(GREATER)	20	90	0.11	0.8	Vacant	NO - Privately-Owned			7		7		Yes	No	No	Yes
2-34	39 W PARK ST STOCKTON CA 95202	13718032		High Density Residential	RH(GREATER)	20	90	0.12	0.8	Vacant	NO - Privately-Owned	4th and 5th		8		8		Yes	No	No	Yes

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2-35	107 W PARK ST STOCKTON CA 95202	13718040		High Density Residential	RH(GREATER)	20	90	0.11	0.8	Vacant	NO - Privately-Owned			7		7		Yes	No	No	Yes
2-36	231 E ROSE ST STOCKTON CA 95202	13903023		Low Density Residential	CO(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
2-37	741 N HUNTER ST STOCKTON CA 95202	13905403		Commercial	CD(GREATER)	20	90	0.23	0.4464	Vacant	NO - Privately-Owned			9		9		Yes	No	No	Yes
2-38	748 N HUNTER ST STOCKTON CA 95202	13905601		Commercial	CO(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
2-39	719 N CALIFORNIA ST STOCKTON CA 95202	13917407		Commercial	CG(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
2-40	701 N CALIFORNIA ST STOCKTON CA 95202	13917408		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
2-41	435 E PARK ST STOCKTON CA 95202	13917409		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
2-42	425 E PARK ST STOCKTON CA 95202	13917410		Commercial	CO(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
2-43	1028 N SUTTER ST STOCKTON CA 95202	13918032		Low Density Residential	CO(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
3-1	821 PLEASANT AV && STOCKTON CA 95205	14104017	Yes, 3-1 through 3-3	Commercial	CG(OUTSIDE)	17.5	30	0.12	0.4464	Vacant	NO - Privately-Owned	4th and 5th	1			1	Units not counted towards the RHNA.	Yes	No	No	Yes
3-2	821 PLEASANT AV STOCKTON CA 95205	14104018	Yes, 3-1 through 3-3	Commercial	CG(OUTSIDE)	17.5	30	0.28	0.4464	Vacant	NO - Privately-Owned	4th and 5th	3			3	Units not counted towards the RHNA.	Yes	No	No	Yes
3-3	740 N WILSON WY STOCKTON CA 95205	14107022	Yes, 3-1 through 3-3	Commercial	CG(OUTSIDE)	17.5	30	6	0.4464	Vacant	NO - Privately-Owned	4th and 5th	80			80	Units not counted towards the RHNA.	Yes	No	No	Yes
3-4	1220 E MINER AV STOCKTON CA 95205	15116026	Yes, 3-4 and 3-5	Commercial	CN(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
3-5	220 N PILGRIM ST STOCKTON CA 95205	15116059	Yes, 3-4 and 3-5	Commercial	CN(GREATER)	20	90	0.3	0.4464	Vacant	NO - Privately-Owned	4th and 5th		12		12		Yes	No	No	Yes
3-6		14308061		Commercial	CG(OUTSIDE)	17.5	30	3.5	0.4464	Vacant	NO - Privately-Owned	5th	46			46		Yes	No	No	No
3-7	1240 KLINGER RD STOCKTON CA 95205	11710006		Commercial	CG(OUTSIDE)	17.5	30	0.13	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
3-8	2225 WEST LN STOCKTON CA 95205	11710007		Commercial	CG(OUTSIDE)	17.5	30	0.14	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
3-9	1920 N WILSON WY STOCKTON CA 95205	11714024		Commercial	CG(OUTSIDE)	17.5	30	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
3-10	1926 N WILSON WY STOCKTON CA 95205	11714026		Commercial	CG(OUTSIDE)	17.5	30	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
3-11	1934 N WILSON WY STOCKTON CA 95205	11714028		Commercial	CG(OUTSIDE)	17.5	30	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
3-12	1064 WATERLOO RD STOCKTON CA 95205	14105039		Commercial	CG(OUTSIDE)	17.5	30	0.34	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
3-13	1 *UNASSIGNED STOCKTON CA 95205	14109035		Commercial	CG(OUTSIDE)	17.5	30	0.21	0.4464	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
3-14	2653 E FREMONT ST STOCKTON CA 95205	14308028		Commercial	CG(OUTSIDE)	17.5	30	0.36	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	No
3-15	704 N FILBERT ST STOCKTON CA 95205	14308036		Medium Density Residential	RM	8.8	17.4	1.3	0.8	Vacant	NO - Privately-Owned	4th and 5th		18		18		Yes	No	No	No
3-16	738 N FILBERT ST F STOCKTON CA 95205	14308037		Medium Density Residential	RM	8.8	17.4	2.54	0.8	Vacant	NO - Privately-Owned	4th and 5th		35		35		Yes	No	No	No
3-17	829 N GOLDEN GATE AV STOCKTON CA 95205	14346016		Low Density Residential	RL	0	8.7	0.29	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	No
3-18	1 *UNASSIGNED STOCKTON CA 95205	15108036		Commercial	CN(GREATER)	20	90	0.4	0.4464	Vacant	NO - Privately-Owned			16		16		Yes	No	No	Yes
3-19	647 N UNION ST STOCKTON CA 95205	15108037		Commercial	CN(GREATER)	20	90	0.64	0.4464	Vacant	NO - Privately-Owned		25			25		Yes	No	No	Yes
3-20	640 N UNION ST STOCKTON CA 95205	15108049		Commercial	CN(GREATER)	20	90	0.47	0.4464	Vacant	NO - Privately-Owned			18		18		Yes	No	No	Yes
3-21	1121 E OAK ST STOCKTON CA 95205	15108054		Commercial	CN(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
3-22	1221 E OAK ST STOCKTON CA 95205	15109111		Commercial	RH(GREATER)	20	90	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		7		7		Yes	No	No	Yes
3-23	1025 E LINDSAY ST STOCKTON CA 95205	15112002		Commercial	CN(GREATER)	20	90	0.34	0.4464	Vacant	NO - Privately-Owned			13		13		Yes	No	No	Yes
3-24	1004 E LINDSAY ST STOCKTON CA 95205	15112050		Commercial	CN(GREATER)	20	90	1.03	0.4464	Vacant	NO - Privately-Owned		41			41		Yes	No	No	Yes

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3-25	1 *UNASSIGNED STOCKTON CA 95205	15112054		Commercial	CN(GREATER)	20	90	0.34	0.4464	Vacant	NO - Privately-Owned			13		13		Yes	No	No	Yes
3-26	425 N UNION ST STOCKTON CA 95205	15112062		Commercial	CN(GREATER)	20	90	0.7	0.4464	Vacant	NO - Privately-Owned		28			28		Yes	No	No	Yes
3-27	336 N AIRPORT WY STOCKTON CA 95205	15113031		Commercial	RH(GREATER)	20	90	0.11	0.8	Vacant	NO - Privately-Owned			7		7		Yes	No	No	Yes
3-28	1139 CHANNEL ST B STOCKTON CA 95205	15116015		Commercial	CN(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
3-29	1435 E WEBER AV STOCKTON CA 95205	15117033		Commercial	CN(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
3-30	1328 CHANNEL ST STOCKTON CA 95205	15117040		Commercial	CN(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
3-31	139 N SIERRA NEVADA ST STOCKTON CA 95205	15117043		Commercial	CN(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
3-32	1339 E WEBER AV STOCKTON CA 95205	15117045		Commercial	CN(GREATER)	20	90	0.1	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
3-33	1327 E WEBER AV STOCKTON CA 95205	15117046		Commercial	CN(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
3-34	1102 E WEBER AV STOCKTON CA 95205	15120301		Commercial	CN(GREATER)	20	90	0.34	0.4464	Vacant	NO - Privately-Owned	4th and 5th		13		13		Yes	No	No	Yes
3-35	1135 E MAIN ST STOCKTON CA 95205	15120308		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
3-36	1140 E MAIN ST STOCKTON CA 95205	15120406		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
3-37	1226 E MAIN ST STOCKTON CA 95205	15120603		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
3-38	20 S PILGRIM ST STOCKTON CA 95205	15120615		Commercial	RH(GREATER)	20	90	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		12		12		Yes	No	No	Yes
3-39	1424 E WEBER AV STOCKTON CA 95205	15121016		Commercial	CN(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
3-40	34 S SIERRA NEVADA ST STOCKTON CA 95205	15121036		Commercial	RH(GREATER)	20	90	0.11	0.8	Vacant	NO - Privately-Owned			7		7		Yes	No	No	Yes
3-41	1348 E MAIN ST STOCKTON CA 95205	15121042		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
3-42	1405 E MAIN ST STOCKTON CA 95205	15121061		Commercial	CG(GREATER)	20	90	0.36	0.4464	Vacant	NO - Privately-Owned	4th and 5th		14		14		Yes	No	No	Yes
3-43	1120 E MARKET ST STOCKTON CA 95205	15124005		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
3-44	1134 E MARKET ST STOCKTON CA 95205	15124008		Commercial	RH(GREATER)	20	90	0.19	0.8	Vacant	NO - Privately-Owned	4th and 5th		13		13		Yes	No	No	Yes
3-45	1346 E MARKET ST STOCKTON CA 95205	15125106		Commercial	RH(GREATER)	20	90	0.12	0.8	Vacant	NO - Privately-Owned	4th and 5th		8		8		Yes	No	No	Yes
3-46	129 S SIERRA NEVADA ST STOCKTON CA 95205	15125108		Commercial	RH(GREATER)	20	90	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		7		7		Yes	No	No	Yes
3-47	1604 E LINDSAY ST STOCKTON CA 95205	15302027		Medium Density Residential	RM	8.8	17.4	0.16	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
3-48	1602 E LINDSAY ST STOCKTON CA 95205	15302036		Medium Density Residential	RM	8.8	17.4	0.18	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
3-49	36 N WILSON WY STOCKTON CA 95205	15304018		Commercial	CG(OUTSIDE)	17.5	30	0.71	0.4464	Vacant	NO - Privately-Owned		9			9		Yes	No	No	Yes
3-50	1649 CHANNEL ST STOCKTON CA 95205	15306005		Medium Density Residential	RM	8.8	17.4	0.12	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
3-51	1902 E MARKET ST STOCKTON CA 95205	15309060		Medium Density Residential	RM	8.8	17.4	0.13	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
3-52	1914 MYRTLE ST STOCKTON CA 95205	15309061		Medium Density Residential	RM	8.8	17.4	0.13	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
3-53	1918 MYRTLE ST STOCKTON CA 95205	15309062		Medium Density Residential	RM	8.8	17.4	0.13	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
3-54	2169 E MAIN ST STOCKTON CA 95205	15310504		Commercial	CG(OUTSIDE)	17.5	30	0.16	0.4464	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
3-55	2269 FINLAND AV STOCKTON CA 95205	15315040		Medium Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
3-56	2202 E LAFAYETTE ST STOCKTON CA 95205	15320201		Low Density Residential	RL	0	8.7	0.26	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes

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3-57	2371 MARSH ST STOCKTON CA 95205	15320616		Commercial	CG(OUTSIDE)	17.5	30	0.2	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	No
3-58	2498 E LAFAYETTE ST STOCKTON CA 95205	15321013		Medium Density Residential	RM	8.8	17.4	0.13	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	No
3-59	1710 E MAIN ST STOCKTON CA 95205	15502020		Commercial	CG(OUTSIDE)	17.5	30	0.13	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
3-60	1718 E MARKET ST STOCKTON CA 95205	15522003		Commercial	CG(OUTSIDE)	17.5	30	0.14	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
3-61	1736 E MARKET ST STOCKTON CA 95205	15522005		Commercial	CG(OUTSIDE)	17.5	30	0.13	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
3-62	111 S LOCUST ST STOCKTON CA 95205	15522007		Medium Density Residential	RM	8.8	17.4	0.14	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
3-63	156 DELLA ST STOCKTON CA 95205	15522055		Medium Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
3-64	120 S LOCUST ST STOCKTON CA 95205	15522061		Commercial	CG(OUTSIDE)	17.5	30	0.25	0.4464	Vacant	NO - Privately-Owned	4th and 5th		3		3		Yes	No	No	Yes
3-65	2136 E MAIN ST STOCKTON CA 95205	15524005		Commercial	CG(OUTSIDE)	17.5	30	0.1	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
3-66	2144 E MAIN ST STOCKTON CA 95205	15524030		Commercial	CG(OUTSIDE)	17.5	30	0.1	0.4464	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
3-67	2274 E MAIN ST STOCKTON CA 95205	15535008		Commercial	CG(OUTSIDE)	17.5	30	0.13	0.4464	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
3-68	809 SHARON AV STOCKTON CA 95205	15538029		Medium Density Residential	RM	8.8	17.4	0.29	0.8	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	No
3-69	2414 E WORTH ST STOCKTON CA 95205	15539023		Medium Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	No
3-70	2426 E MAIN ST STOCKTON CA 95205	15541007		Commercial	CG(OUTSIDE)	17.5	30	0.11	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	No
3-71	2428 E MAIN ST STOCKTON CA 95205	15541008		Commercial	CG(OUTSIDE)	17.5	30	0.11	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	No
3-72	2409 E MAIN ST STOCKTON CA 95205	15542001		Commercial	CG(OUTSIDE)	17.5	30	0.48	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	No
3-73	2531 E MAIN ST STOCKTON CA 95205	15543022		Commercial	CG(OUTSIDE)	17.5	30	0.1	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	No
3-74	2849 E LAFAYETTE ST STOCKTON CA 95205	15703013		Low Density Residential	RL	0	8.7	0.4	0.8	Vacant	Yes - City Owned		1		1	2		Yes	No	No	No
3-75	639 DAVID AV STOCKTON CA 95205	15709030		Commercial	CG(OUTSIDE)	17.5	30	0.22	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	No
3-76	2935 E MAIN ST STOCKTON CA 95205	15709031		Commercial	CG(OUTSIDE)	17.5	30	0.16	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	No
3-77	2919 E MAIN ST STOCKTON CA 95205	15709032		Commercial	CG(OUTSIDE)	17.5	30	0.19	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	No
3-78	2915 E MAIN ST STOCKTON CA 95205	15709033		Commercial	CG(OUTSIDE)	17.5	30	0.15	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	No
3-79	3002 E MAIN ST STOCKTON CA 95205	15710318		Commercial	CG(OUTSIDE)	17.5	30	0.64	0.4464	Vacant	NO - Privately-Owned	4th and 5th	8			8		Yes	No	No	No
3-80		15710319		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	No
3-81	1037 NETHERTON AV STOCKTON CA 95205	15711019		Low Density Residential	RL	0	8.7	0.21	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	No
3-82	1114 SULLIVAN AV STOCKTON CA 95205	15713002		Low Density Residential	RL	0	8.7	0.38	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	No
3-83	1106 BURKETT AV STOCKTON CA 95205	15713005		Low Density Residential	RL	0	8.7	1.38	0.8	Vacant	NO - Privately-Owned	4th and 5th		9		9		Yes	No	No	No
3-84	935 S BROADWAY AV STOCKTON CA 95205	15716006		Low Density Residential	RL	0	8.7	0.26	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	No
3-85	716 S WINDSOR AV STOCKTON CA 95205	15717038		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	No
4-1	550 W SONORA ST STOCKTON CA 95203	14703001	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.23	0.4464	Vacant	NO - Privately-Owned		9			9	Units not counted towards the RHNA.	Yes	No	No	Yes
4-2	524 W SONORA ST STOCKTON CA 95203	14703002	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned		4			4	Units not counted towards the RHNA.	Yes	No	No	Yes
4-3	407 S LINCOLN ST STOCKTON CA 952033311	14703003	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.34	0.4464	Vacant	NO - Privately-Owned		13			13	Units not counted towards the RHNA.	Yes	No	No	Yes
4-4	413 S LINCOLN ST STOCKTON CA 95203	14703004	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned		6			6	Units not counted towards the RHNA.	Yes	No	No	Yes

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4-5	427 S LINCOLN ST STOCKTON CA 95203	14703005	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned		6			6	Units not counted towards the RHNA.	Yes	No	No	Yes
4-6	443 S LINCOLN ST STOCKTON CA 95203	14703006	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned		4			4	Units not counted towards the RHNA.	Yes	No	No	Yes
4-7	511 W CHURCH ST STOCKTON CA 95203	14703007	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned		4			4	Units not counted towards the RHNA.	Yes	No	No	Yes
4-8	521 W CHURCH ST STOCKTON CA 95203	14703008	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned		4			4	Units not counted towards the RHNA.	Yes	No	No	Yes
4-9	525 W CHURCH ST STOCKTON CA 95203	14703009	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned		4			4	Units not counted towards the RHNA.	Yes	No	No	Yes
4-10	533 W CHURCH ST STOCKTON CA 95203	14703010	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned		4			4	Units not counted towards the RHNA.	Yes	No	No	Yes
4-11	446 S HARRISON ST STOCKTON CA 95203	14703011	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned		4			4	Units not counted towards the RHNA.	Yes	No	No	Yes
4-12	428 S HARRISON ST STOCKTON CA 95203	14703012	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned		4			4	Units not counted towards the RHNA.	Yes	No	No	Yes
4-13	424 S HARRISON ST STOCKTON CA 95203	14703013	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned		4			4	Units not counted towards the RHNA.	Yes	No	No	Yes
4-14	420 S HARRISON ST STOCKTON CA 95203	14703014	Yes, 4-1 through 4-14	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned		4			4	Units not counted towards the RHNA.	Yes	No	No	Yes
4-15	30 W LAFAYETTE ST STOCKTON CA 95203	13731006	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.37	0.4464	Vacant	NO - Privately-Owned	4th and 5th		14		14		Yes	No	No	Yes
4-16	28 W LAFAYETTE ST STOCKTON CA 95203	13731007	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.03	0.4464	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
4-17	22 W LAFAYETTE ST STOCKTON CA 95203	13731008	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.05	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-18	2 W LAFAYETTE ST STOCKTON CA 95203	13731009	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-19	317 S CENTER ST STOCKTON CA 95203	13731010	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.14	0.4464	Vacant	NO - Privately-Owned	4th and 5th		5		5		Yes	No	No	Yes
4-20	325 S CENTER ST STOCKTON CA 95203	13731011	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	5th		4		4		Yes	No	No	Yes
4-21	339 S CENTER ST STOCKTON CA 95203	13731012	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.23	0.4464	Vacant	NO - Privately-Owned	4th and 5th		9		9		Yes	No	No	Yes
4-22	1 *UNASSIGNED STOCKTON CA 95203	13731013	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.23	0.4464	Vacant	NO - Privately-Owned	4th and 5th		9		9		Yes	No	No	Yes
4-23	40 W SONORA ST STOCKTON CA 95203	13731014	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.06	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-24	31 W SONORA ST STOCKTON CA 95203	13731015	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.06	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-25	43 W SONORA ST STOCKTON CA 95203	13731016	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-26	47 W SONORA ST STOCKTON CA 95203	13731017	Yes, 4-15 through 4-26	Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-27	2211 S AIRPORT WY STOCKTON CA 95206	16908049	Yes, 4-27 through 4-30	Administrative Professional	CN(OUTSIDE)	17.5	30	0.11	0.4464	Vacant	NO - Privately-Owned		1			1	Units not counted towards the RHNA.	Yes	No	No	Yes
4-28	2211 S AIRPORT WY & STOCKTON CA 95206	16908050	Yes, 4-27 through 4-30	Administrative Professional	CN(OUTSIDE)	17.5	30	0.12	0.4464	Vacant	NO - Privately-Owned		1			1	Units not counted towards the RHNA.	Yes	No	No	Yes
4-29	2347 S AIRPORT WY STOCKTON CA 95206	16909051	Yes, 4-27 through 4-30	Administrative Professional	CN(OUTSIDE)	17.5	30	0.48	0.4464	Vacant	NO - Privately-Owned		6			6	Units not counted towards the RHNA.	Yes	No	No	Yes
4-30	2361 S AIRPORT WY STOCKTON CA 95206	16909052	Yes, 4-27 through 4-30	Administrative Professional	CN(OUTSIDE)	17.5	30	0.23	0.4464	Vacant	NO - Privately-Owned		3			3	Units not counted towards the RHNA.	Yes	No	No	Yes
4-33	411 S STANISLAUS ST & STOCKTON CA 95203	14926120		Commercial	RH(GREATER)	20	90	1.66	0.8	Vacant	Yes - City Owned	5th	17		102	119		Yes	No	No	Yes
4-34		14729412		Commercial	CG(GREATER)	20	90	0.69	0.4464	Vacant	NO - Privately-Owned		27			27		Yes	No	No	Yes
4-35	507 S LINCOLN ST STOCKTON CA 95203	14703017		Commercial	CG(GREATER)	20	90	0.98	0.4464	Vacant	NO - Privately-Owned		39			39		Yes	No	No	Yes
4-36	510 W CHURCH ST STOCKTON CA 95203	14703018		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
4-37	547 S LINCOLN ST STOCKTON CA 95203	14703020		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
4-38	819 S LINCOLN ST STOCKTON CA 95206	14705004		Industrial	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes

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4-39	821 S LINCOLN ST STOCKTON CA 95206	14705005		Medium Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-40	822 S HARRISON ST STOCKTON CA 95206	14705011		Medium Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-41	645 W ANDERSON ST STOCKTON CA 95206	14705077		Medium Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
4-42	1321 S VAN BUREN ST STOCKTON CA 95206	14707605		Low Density Residential	CG(GREATER)	20	90	0.34	0.4464	Vacant	NO - Privately-Owned			13		13		Yes	No	No	Yes
4-43	201 TURNPIKE RD STOCKTON CA 95206	14708604		Commercial	CG(GREATER)	20	90	0.15	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
4-44	1201 S CENTER ST STOCKTON CA 95206	14716003		Commercial	CG(GREATER)	20	90	0.31	0.4464	Vacant	NO - Privately-Owned	4th and 5th		12		12		Yes	No	No	Yes
4-45	1203 S CENTER ST STOCKTON CA 95206	14716004		Commercial	CG(GREATER)	20	90	0.57	0.4464	Vacant	NO - Privately-Owned		22			22		Yes	No	No	Yes
4-46	1220 S EL DORADO ST STOCKTON CA 95206	14716023		Commercial	CG(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
4-47	44 E CLAY ST STOCKTON CA 95206	14716028		Commercial	CG(GREATER)	20	90	0.23	0.4464	Vacant	NO - Privately-Owned	4th and 5th		9		9		Yes	No	No	Yes
4-48	44 W CLAY ST STOCKTON CA 95206	14716032		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-49	1113 S EL DORADO ST STOCKTON CA 95206	14719007		Commercial	CN(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-50	35 E JACKSON ST STOCKTON CA 95206	14719010		Commercial	RH(GREATER)	20	90	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		7		7		Yes	No	No	Yes
4-51	223 E JEFFERSON ST STOCKTON CA 95206	14720112		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-52	1140 S SAN JOAQUIN ST STOCKTON CA 95206	14720313		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
4-53	915 S SAN JOAQUIN ST STOCKTON CA 95206	14721208		Low Density Residential	RM	8.8	17.4	0.16	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-54	820 S SUTTER ST STOCKTON CA 95206	14721510		Commercial	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-55	804 S SUTTER ST STOCKTON CA 95206	14721511		Commercial	CG(GREATER)	20	90	0.52	0.4464	Vacant	NO - Privately-Owned		20			20		Yes	No	No	Yes
4-56	702 S SAN JOAQUIN ST STOCKTON CA 95203	14722008		Commercial	CG(GREATER)	20	90	0.26	0.4464	Vacant	NO - Privately-Owned			10		10		Yes	No	No	Yes
4-57	1 *UNASSIGNED STOCKTON CA 95203	14722011		Commercial	CG(GREATER)	20	90	0.35	0.4464	Vacant	NO - Privately-Owned			14		14		Yes	No	No	Yes
4-58	713 S CALIFORNIA ST STOCKTON CA 95203	14723002		Commercial	CG(GREATER)	20	90	0.78	0.4464	Vacant	NO - Privately-Owned		31			31		Yes	No	No	Yes
4-59	440 E WORTH ST STOCKTON CA 95206	14724005		Low Density Residential	CN(GREATER)	20	90	0.21	0.4464	Vacant	NO - Privately-Owned			8		8		Yes	No	No	Yes
4-60	918 S CALIFORNIA ST B STOCKTON CA 95206	14724037		Low Density Residential	RM	8.8	17.4	0.25	0.8	Vacant	NO - Privately-Owned	4th and 5th		3		3		Yes	No	No	Yes
4-61	1120 S AMERICAN ST STOCKTON CA 95206	14727033		Low Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-62	1219 S STANISLAUS ST STOCKTON CA 95206	14727040		Low Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-63	627 E WORTH ST STOCKTON CA 95206	14729207		Commercial	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-64	817 S GRANT ST STOCKTON CA 95206	14729402		Commercial	CG(GREATER)	20	90	0.34	0.4464	Vacant	NO - Privately-Owned			13		13		Yes	No	No	Yes
4-65	825 S GRANT ST STOCKTON CA 95206	14729403		Commercial	CG(GREATER)	20	90	0.34	0.4464	Vacant	NO - Privately-Owned			13		13		Yes	No	No	Yes
4-66	707 E WORTH ST STOCKTON CA 95206	14729409		Commercial	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
4-67	747 S GRANT ST STOCKTON CA 95203	14730005		Commercial	CG(GREATER)	20	90	0.46	0.4464	Vacant	Yes - City Owned				18	18		Yes	No	Yes	Yes
4-68	720 S STANISLAUS ST STOCKTON CA 95203	14730006		Commercial	CG(GREATER)	20	90	0.92	0.4464	Vacant	NO - Privately-Owned		36			36		Yes	No	Yes	Yes
4-69	635 S AURORA ST STOCKTON CA 95203	14730007		Commercial	CG(GREATER)	20	90	2	0.4464	Vacant	NO - Privately-Owned		80			80		Yes	No	No	Yes

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4-70	904 S GRANT ST STOCKTON CA 95206	14731003		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned	5th		1		1		Yes	No	No	Yes
4-71	820 E WORTH ST STOCKTON CA 95206	14731005		Low Density Residential	RM	8.8	17.4	0.23	0.8	Vacant	NO - Privately-Owned	5th		3		3		Yes	No	No	Yes
4-72	1 *UNASSIGNED STOCKTON CA 95206	14731008		Low Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-73	926 S GRANT ST STOCKTON CA 95206	14731017		Low Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned	5th		2		2		Yes	No	No	Yes
4-74	929 S AURORA ST STOCKTON CA 95206	14731019		Low Density Residential	RM	8.8	17.4	0.41	0.8	Vacant	NO - Privately-Owned			5		5		Yes	No	No	Yes
4-75	1306 S AMERICAN ST STOCKTON CA 95206	14734101		Low Density Residential	RM	8.8	17.4	0.23	0.8	Vacant	NO - Privately-Owned			3		3		Yes	No	No	Yes
4-76	810 E JACKSON ST STOCKTON CA 95206	14734402		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-77	111 E SONORA ST STOCKTON CA 95203	14906311		Commercial	CD(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-78	348 S EL DORADO ST STOCKTON CA 95203	14906312		Commercial	CD(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-79	134 E SONORA ST STOCKTON CA 95203	14906405		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-80	121 E CHURCH ST STOCKTON CA 95203	14906412		Commercial	CD(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-81	430 S EL DORADO ST STOCKTON CA 95203	14906413		Commercial	CD(GREATER)	20	90	0.38	0.4464	Vacant	NO - Privately-Owned	4th and 5th		15		15		Yes	No	No	Yes
4-82	329 S SAN JOAQUIN ST STOCKTON CA 95203	14906507		Commercial	CD(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
4-83	231 E SONORA ST STOCKTON CA 95203	14906510		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-84	1 *UNASSIGNED STOCKTON CA 95203	14907041		Commercial	CG(GREATER)	20	90	0.68	0.4464	Vacant	NO - Privately-Owned		27			27		Yes	No	No	Yes
4-85	319 E HAZELTON AV STOCKTON CA 95203	14908114		Commercial	CG(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
4-86	302 E HAZELTON AV STOCKTON CA 95203	14908202		Commercial	CG(GREATER)	20	90	0.52	0.4464	Vacant	NO - Privately-Owned		20			20		Yes	No	Yes	Yes
4-87	539 S CALIFORNIA ST STOCKTON CA 95203	14908308		High Density Residential	RH(GREATER)	20	90	0.14	0.8	Vacant	NO - Privately-Owned	4th and 5th		10		10		Yes	No	No	Yes
4-88	547 S CALIFORNIA ST STOCKTON CA 95203	14908310		High Density Residential	RH(GREATER)	20	90	0.25	0.8	Vacant	NO - Privately-Owned	4th and 5th		18		18		Yes	No	No	Yes
4-89	518 S SUTTER ST STOCKTON CA 95203	14908316		High Density Residential	RH(GREATER)	20	90	0.11	0.8	Vacant	NO - Privately-Owned			7		7		Yes	No	No	Yes
4-90	432 E HAZELTON AV STOCKTON CA 95203	14908408		Commercial	CG(GREATER)	20	90	0.18	0.4464	Vacant	NO - Privately-Owned			7		7		Yes	No	No	Yes
4-91	701 S CALIFORNIA ST STOCKTON CA 95203	14908409		Commercial	CG(GREATER)	20	90	0.18	0.4464	Vacant	NO - Privately-Owned			7		7		Yes	No	Yes	Yes
4-92	421 S SUTTER ST STOCKTON CA 95203	14909206		Commercial	RH(GREATER)	20	90	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		12		12		Yes	No	No	Yes
4-93	412 E LAFAYETTE ST STOCKTON CA 95203	14909302		Commercial	CD(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-94	1 *UNASSIGNED STOCKTON CA 95203	14909303		Commercial	CD(GREATER)	20	90	0.12	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
4-95	320 S SUTTER ST STOCKTON CA 95203	14909313		Commercial	CD(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
4-96	528 E LAFAYETTE ST STOCKTON CA 95203	14909502	Yes, 4-96, 4-97, 4-230	Commercial	CD(GREATER)	20	90	0.11	0.4464	Vacant	Yes - City Owned	4th and 5th	1		3	4		Yes	No	No	Yes
4-97	317 S AMERICAN ST STOCKTON CA 95203	14909504	Yes, 4-96, 4-97, 4-230	Commercial	CD(GREATER)	20	90	0.14	0.4464	Vacant	Yes - City Owned	4th and 5th	1		4	5		Yes	No	No	Yes
4-98	310 S CALIFORNIA ST STOCKTON CA 95203	14909516		Commercial	CD(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
4-99	712 E LAFAYETTE ST STOCKTON CA 95203	14926302		High Density Residential	RH(GREATER)	20	90	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		7		7		Yes	No	No	Yes
4-100	315 S GRANT ST STOCKTON CA 95203	14926308		High Density Residential	RH(GREATER)	20	90	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		12		12		Yes	No	No	Yes
4-101	745 E SONORA ST STOCKTON CA 95203	14926309		High Density Residential	RH(GREATER)	20	90	0.29	0.8	Vacant	NO - Privately-Owned	4th and 5th		20		20		Yes	No	No	Yes

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4-102	635 S AURORA ST A STOCKTON CA 95203	14927055		Commercial	CG(GREATER)	20	90	1.38	0.4464	Vacant	NO - Privately-Owned		55			55		Yes	No	No	Yes
4-103	760 E HAZELTON AV STOCKTON CA 95203	14927059		Commercial	CG(GREATER)	20	90	1.07	0.4464	Vacant	NO - Privately-Owned		42			42		Yes	No	Yes	Yes
4-104	816 E HAZELTON AV STOCKTON CA 95203	14927061		Commercial	CG(GREATER)	20	90	0.62	0.4464	Vacant	NO - Privately-Owned		24			24		Yes	No	No	Yes
4-105	822 E HAZELTON AV STOCKTON CA 95203	14927062		Commercial	CG(GREATER)	20	90	0.13	0.4464	Vacant	NO - Privately-Owned			5		5		Yes	No	No	Yes
4-106	826 E HAZELTON AV STOCKTON CA 95203	14927063		Commercial	CG(GREATER)	20	90	0.13	0.4464	Vacant	NO - Privately-Owned			5		5		Yes	No	No	Yes
4-107	830 E HAZELTON AV STOCKTON CA 95203	14927064		Commercial	CG(GREATER)	20	90	0.13	0.4464	Vacant	NO - Privately-Owned			5		5		Yes	No	No	Yes
4-109	342 S UNION ST STOCKTON CA 95205	15126014		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-110	326 S UNION ST STOCKTON CA 95205	15126015		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-111	1120 E SONORA ST STOCKTON CA 95205	15126020		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
4-112	1119 E CHURCH ST STOCKTON CA 95205	15126030		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned	5th		1		1		Yes	No	No	Yes
4-113	1107 E CHURCH ST STOCKTON CA 95205	15126031		Low Density Residential	RM	8.8	17.4	0.23	0.8	Vacant	NO - Privately-Owned	5th		3		3		Yes	No	No	Yes
4-114	1125 E SONORA ST STOCKTON CA 95205	15126042		Low Density Residential	RM	8.8	17.4	0.23	0.8	Vacant	NO - Privately-Owned			3		3		Yes	No	No	Yes
4-115	619 S SIERRA NEVADA ST STOCKTON CA 95205	15129407		Low Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-116	1429 E HAZELTON AV STOCKTON CA 95205	15129507		Commercial	CG(GREATER)	20	90	0.11	0.4464	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
4-117	615 S WILSON WY STOCKTON CA 95205	15129607		Commercial	CG(GREATER)	20	90	0.15	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
4-118	1321 E WORTH ST STOCKTON CA 95205	15131024		Medium Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-119	1423 E WORTH ST STOCKTON CA 95205	15131059		Medium Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
4-120	927 S SIERRA NEVADA ST STOCKTON CA 95205	15133309		Medium Density Residential	RM	8.8	17.4	0.15	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-121	1001 S WILSON WY STOCKTON CA 95205	15133409		Commercial	CG(GREATER)	20	90	0.23	0.4464	Vacant	NO - Privately-Owned			9		9		Yes	No	No	Yes
4-122	924 S SIERRA NEVADA ST STOCKTON CA 95205	15133516		Medium Density Residential	RM	8.8	17.4	0.14	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
4-123	1145 E JACKSON ST STOCKTON CA 95205	15134007		Low Density Residential	RM	8.8	17.4	0.16	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-124	1112 E JACKSON ST STOCKTON CA 95205	15134012		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-125	1203 S PILGRIM ST STOCKTON CA 95205	15134013		Low Density Residential	RM	8.8	17.4	0.36	0.8	Vacant	NO - Privately-Owned			5		5		Yes	No	No	Yes
4-126	1215 S PILGRIM ST STOCKTON CA 95205	15134014		Low Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-127	1149 E CLAY ST STOCKTON CA 95205	15134016		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-128	1133 E CLAY ST STOCKTON CA 95205	15134018		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-129	1121 E CLAY ST STOCKTON CA 95205	15134019		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-130	1218 S UNION ST STOCKTON CA 95205	15134021		Low Density Residential	RM	8.8	17.4	0.23	0.8	Vacant	NO - Privately-Owned			3		3		Yes	No	No	Yes
4-131	1202 S PILGRIM ST STOCKTON CA 95205	15135009		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-132	1218 S PILGRIM ST STOCKTON CA 95205	15135010		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-133	1242 E JACKSON ST STOCKTON CA 95205	15135013		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-134	1215 S AIRPORT WY STOCKTON CA 95205	15135015		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes

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4-135	1227 S AIRPORT WY STOCKTON CA 95205	15135016		Low Density Residential	RM	8.8	17.4	0.11	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-136	1337 S PILGRIM ST STOCKTON CA 95205	15136012		Commercial	CG(GREATER)	20	90	0.17	0.4464	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
4-137	1140 E CLAY ST STOCKTON CA 95205	15136013		Commercial	CG(GREATER)	20	90	0.16	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
4-138	1313 E DR MARTIN LUTHER KING JR BL STOCKTON CA 95205	15137007		Commercial	CG(GREATER)	20	90	0.43	0.4464	Vacant	NO - Privately-Owned			17		17		Yes	No	No	Yes
4-139	1517 E SCOTTS AV STOCKTON CA 95205	15506010		Commercial	CG(OUTSIDE)	17.5	30	0.12	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-140	731 DELLA ST STOCKTON CA 95205	15507011		Medium Density Residential	RM	8.8	17.4	0.14	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-141	1857 E JEFFERSON ST STOCKTON CA 95205	15513023		Medium Density Residential	RM	8.8	17.4	0.13	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-142	319 S LOCUST ST STOCKTON CA 95205	15519022		Medium Density Residential	RM	8.8	17.4	0.15	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-143	1819 E LAFAYETTE ST STOCKTON CA 95205	15522058		Medium Density Residential	RM	8.8	17.4	0.2	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-144	1909 E LAFAYETTE ST && STOCKTON CA 95205	15523026		Medium Density Residential	RM	8.8	17.4	0.13	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-145	226 S A ST STOCKTON CA 95205	15523033		Commercial	CG(OUTSIDE)	17.5	30	0.57	0.4464	Vacant	NO - Privately-Owned	4th and 5th	7			7		Yes	No	No	Yes
4-147	3109 GASWELL LN STOCKTON CA 95206	16412027		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned			1		1		Yes	Yes	No	Yes
4-148	1 *UNASSIGNED STOCKTON CA 95206	16504001		Commercial	CG(OUTSIDE)	17.5	30	0.23	0.4464	Vacant	NO - Privately-Owned	4th and 5th		3		3		Yes	No	No	Yes
4-149	1725 TURNPIKE RD STOCKTON CA 95206	16504021		Commercial	CG(OUTSIDE)	17.5	30	1.09	0.4464	Vacant	NO - Privately-Owned	4th and 5th	14			14		Yes	No	No	Yes
4-150	1987 S MADISON ST STOCKTON CA 95206	16508062		Low Density Residential	RL	0	8.7	0.3	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-151	562 W SEVENTH ST STOCKTON CA 95206	16517049		Commercial	CG(OUTSIDE)	17.5	30	0.13	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-152	2321 S MADISON ST STOCKTON CA 95206	16520214		Low Density Residential	RL	0	8.7	0.24	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-153	15 W NINTH ST STOCKTON CA 95206	16522001		Commercial	CG(OUTSIDE)	17.5	30	0.65	0.4464	Vacant	NO - Privately-Owned	4th and 5th	8			8		Yes	No	No	Yes
4-154	2363 S EL DORADO ST STOCKTON CA 95206	16522002		Commercial	CG(OUTSIDE)	17.5	30	0.13	0.4464	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
4-155	2454 S HARRISON ST STOCKTON CA 95206	16526229		Low Density Residential	RL	0	8.7	0.31	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-156	2470 S HARRISON ST STOCKTON CA 95206	16526230		Low Density Residential	RL	0	8.7	0.31	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-157	1 *UNASSIGNED STOCKTON CA 95206	16528031		Low Density Residential	RL	0	8.7	0.83	0.8	Vacant	NO - Privately-Owned	4th and 5th		5		5		Yes	No	No	Yes
4-158	2935 S LINCOLN ST STOCKTON CA 95206	16528039		Low Density Residential	RL	0	8.7	3.07	0.8	Vacant	NO - Privately-Owned	4th and 5th		21		21		Yes	No	No	Yes
4-159	3076 TURNPIKE RD STOCKTON CA 95206	16528053		Commercial	CG(OUTSIDE)	17.5	30	2.35	0.4464	Vacant	NO - Privately-Owned		31			31		Yes	No	No	Yes
4-160	2557 S MADISON ST STOCKTON CA 95206	16535045		Low Density Residential	RL	0	8.7	0.23	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-161	2558 S MONROE ST STOCKTON CA 95206	16535046		Low Density Residential	RL	0	8.7	0.25	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-162	2220 S COMMERCE ST STOCKTON CA 95206	16536026		Low Density Residential	RL	0	8.7	0.31	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-163	2253 S EL DORADO ST STOCKTON CA 95206	16536031		Commercial	CG(OUTSIDE)	17.5	30	0.43	0.4464	Vacant	NO - Privately-Owned	4th and 5th		5		5		Yes	No	No	Yes
4-164	1445 S EL DORADO ST STOCKTON CA 95206	16702106		Commercial	CG(OUTSIDE)	17.5	30	0.16	0.4464	Vacant	NO - Privately-Owned	5th		2		2		Yes	No	No	Yes
4-165	1451 S EL DORADO ST STOCKTON CA 95206	16702107		Commercial	CG(OUTSIDE)	17.5	30	0.16	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-166	1455 S EL DORADO ST STOCKTON CA 95206	16702108		Commercial	CG(OUTSIDE)	17.5	30	0.16	0.4464	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-167	1434 S CENTER ST STOCKTON CA 95206	16702112		Commercial	CG(OUTSIDE)	17.5	30	0.13	0.4464	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes

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4-168	1 *UNASSIGNED STOCKTON CA 95206	16702113		Commercial	CG(OUTSIDE)	17.5	30	0.13	0.4464	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
4-169	1 *UNASSIGNED STOCKTON CA 95206	16702114		Commercial	CG(OUTSIDE)	17.5	30	0.13	0.4464	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
4-170	1521 S EL DORADO ST STOCKTON CA 95206	16702204		Commercial	CG(OUTSIDE)	17.5	30	0.16	0.4464	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-171	1 *UNASSIGNED STOCKTON CA 95206	16705018		Low Density Residential	RL	0	8.7	0.27	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-172	1 *UNASSIGNED STOCKTON CA 95206	16705019		Low Density Residential	RL	0	8.7	0.28	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-173	2154 S EL DORADO ST STOCKTON CA 95206	16705021		Commercial	CG(OUTSIDE)	17.5	30	1.92	0.4464	Vacant	NO - Privately-Owned	4th and 5th	25			25		Yes	No	No	Yes
4-174	2420 S EL DORADO ST STOCKTON CA 95206	16707001		High Density Residential	RH(OUTSIDE)	17.5	30	0.44	0.8	Vacant	NO - Privately-Owned	4th and 5th		10		10		Yes	No	No	Yes
4-175	627 E SIXTH ST STOCKTON CA 95206	16711612		Low Density Residential	RL	0	8.7	0.35	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-176	1425 S CALIFORNIA ST STOCKTON CA 95206	16715030		Commercial	CG(OUTSIDE)	17.5	30	0.16	0.4464	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-177	1702 S AURORA ST STOCKTON CA 95206	16719508		Low Density Residential	RL	0	8.7	0.34	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-178	644 WILLIAM MOSS BL STOCKTON CA 95206	16817001		High Density Residential	RH(OUTSIDE)	17.5	30	3.59	0.8	Vacant	NO - Privately-Owned	4th and 5th	86			86		Yes	Yes	No	Yes
4-179	600 WILLIAM MOSS BL STOCKTON CA 95206	16817002		High Density Residential	RH(OUTSIDE)	17.5	30	2.04	0.8	Vacant	NO - Privately-Owned	4th and 5th	48			48		Yes	Yes	No	Yes
4-180	1121 FOLSOM ST STOCKTON CA 95206	16904008		Commercial	CG(OUTSIDE)	17.5	30	0.54	0.4464	Vacant	NO - Privately-Owned	4th and 5th	7			7		Yes	No	No	Yes
4-181	1795 S AIRPORT WY STOCKTON CA 95206	16905002		Commercial	CG(OUTSIDE)	17.5	30	1.75	0.4464	Vacant	NO - Privately-Owned	4th and 5th	23			23		Yes	No	No	Yes
4-182	2051 S AIRPORT WY STOCKTON CA 95206	16907701		Administrative Professional	CN(OUTSIDE)	17.5	30	0.48	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
4-183	2135 S AIRPORT WY STOCKTON CA 95206	16907703		Administrative Professional	CN(OUTSIDE)	17.5	30	0.33	0.4464	Vacant	Yes - City Owned		1		3	4		Yes	No	No	Yes
4-184	2427 S AIRPORT WY STOCKTON CA 95206	16910030		Administrative Professional	CO(OUTSIDE)	17.5	30	1.04	0.4464	Vacant	NO - Privately-Owned		13			13		Yes	No	No	Yes
4-185	2427 S AIRPORT WY && STOCKTON CA 95206	16910042		Administrative Professional	CO(OUTSIDE)	17.5	30	0.18	0.4464	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-186	2482 S AIRPORT WY STOCKTON CA 95206	16913325		Commercial	CG(OUTSIDE)	17.5	30	1.48	0.4464	Vacant	NO - Privately-Owned	4th and 5th	19			19		Yes	No	No	Yes
4-187	1402 TWELFTH ST STOCKTON CA 95206	16913524		Commercial	CG(OUTSIDE)	17.5	30	0.76	0.4464	Vacant	NO - Privately-Owned	4th and 5th	10			10		Yes	No	No	Yes
4-188	2348 S AIRPORT WY STOCKTON CA 95206	16915210		Commercial	CG(OUTSIDE)	17.5	30	0.59	0.4464	Vacant	NO - Privately-Owned	4th and 5th	7			7		Yes	No	No	Yes
4-189	1651 E SIXTH ST STOCKTON CA 95206	16919012		High Density Residential	RH(OUTSIDE)	17.5	30	0.12	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		Yes	No	No	Yes
4-190	1661 E SIXTH ST STOCKTON CA 95206	16919014		High Density Residential	RH(OUTSIDE)	17.5	30	0.21	0.8	Vacant	NO - Privately-Owned	4th and 5th		5		5		Yes	No	No	Yes
4-191	1707 E MARIPOSA RD STOCKTON CA 95205	17110007		Commercial	CG(OUTSIDE)	17.5	30	8.56	0.4464	Vacant	NO - Privately-Owned		114			114		Yes	No	No	Yes
4-192	1 *UNASSIGNED STOCKTON CA 95206	17110014		Commercial	CG(OUTSIDE)	17.5	30	3.92	0.4464	Vacant	NO - Privately-Owned		52			52		Yes	No	No	Yes
4-193	1 *UNASSIGNED STOCKTON CA 95206	17110015		Commercial	CG(OUTSIDE)	17.5	30	8.26	0.4464	Vacant	NO - Privately-Owned		110			110		Yes	No	No	Yes
4-194	1665 E MARIPOSA RD STOCKTON CA 95205	17110018		Commercial	CG(OUTSIDE)	17.5	30	0.77	0.4464	Vacant	NO - Privately-Owned	4th and 5th	10			10		Yes	No	No	No
4-195	1667 E MARIPOSA RD STOCKTON CA 95205	17110019		Commercial	CG(OUTSIDE)	17.5	30	0.88	0.4464	Vacant	NO - Privately-Owned	4th and 5th	11			11		Yes	No	No	No
4-196	1 *UNASSIGNED STOCKTON CA 95205	17110022		Commercial	CG(OUTSIDE)	17.5	30	0.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	No
4-197	1903 POCK LN STOCKTON CA 95205	17111006		Medium Density Residential	RM	8.8	17.4	0.3	0.8	Vacant	NO - Privately-Owned			4		4		Yes	No	No	No
4-198	2187 POCK LN STOCKTON CA 95205	17111014		Low Density Residential	RL	0	8.7	1.3	0.8	Vacant	NO - Privately-Owned	4th and 5th		9		9		Yes	No	No	Yes
4-199	2432 POCK LN STOCKTON CA 95205	17125029		Low Density Residential	RM	8.8	17.4	6.32	0.8	Vacant	NO - Privately-Owned			87		87		Yes	No	No	Yes
4-200	2432 POCK LN && STOCKTON CA 95205	17125032		Low Density Residential	RM	8.8	17.4	1.6	0.8	Vacant	NO - Privately-Owned			22		22		Yes	No	No	Yes

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4-201	2085 E MARIPOSA RD STOCKTON CA 95205	17129004		Commercial	CG(OUTSIDE)	17.5	30	0.54	0.4464	Vacant	NO - Privately-Owned		7			7		Yes	No	No	No
4-202	3319 FARMINGTON RD STOCKTON CA 95205	17304025		Low Density Residential	RL	0	8.7	1.76	0.8	Vacant	NO - Privately-Owned			12		12		Yes	No	No	No
4-203	3411 FARMINGTON RD STOCKTON CA 95205	17304049		Low Density Residential	RL	0	8.7	0.63	0.8	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	No
4-204	1 *UNASSIGNED STOCKTON CA 95205	17305028		Low Density Residential	RL	0	8.7	0.3	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	No
4-205	1 *UNASSIGNED STOCKTON CA 95205	17305044		Low Density Residential	RL	0	8.7	0.81	0.8	Vacant	NO - Privately-Owned			5		5		Yes	No	No	No
4-206	1 *UNASSIGNED STOCKTON CA 95205	17305045		Low Density Residential	RL	0	8.7	0.54	0.8	Vacant	NO - Privately-Owned			3		3		Yes	No	No	No
4-207	1 *UNASSIGNED STOCKTON CA 95205	17305046		Low Density Residential	RL	0	8.7	0.54	0.8	Vacant	NO - Privately-Owned	4th and 5th		3		3		Yes	No	No	No
4-208	1 *UNASSIGNED STOCKTON CA 95205	17305047		Low Density Residential	RL	0	8.7	0.27	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	No
4-209	2702 HARRIS AV STOCKTON CA 95206	17507006		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-210	1 *UNASSIGNED STOCKTON CA 95206	17507008		Low Density Residential	RL	0	8.7	2.73	0.8	Vacant	Yes - City Owned				19	19		Yes	No	No	Yes
4-211	3355 TURNPIKE RD STOCKTON CA 95206	17508005		Commercial	CG(OUTSIDE)	17.5	30	0.96	0.4464	Vacant	NO - Privately-Owned		12			12		No	No	Yes	Yes
4-212	473 DOWNING AV STOCKTON CA 95206	17508008		Commercial	CG(OUTSIDE)	17.5	30	0.41	0.4464	Vacant	NO - Privately-Owned			5		5		No	No	Yes	Yes
4-213	3331 TURNPIKE RD STOCKTON CA 95206	17508012		Commercial	CG(OUTSIDE)	17.5	30	0.47	0.4464	Vacant	NO - Privately-Owned			6		6		No	No	Yes	Yes
4-214	3306 TURNPIKE RD STOCKTON CA 95206	17508017		Commercial	CG(OUTSIDE)	17.5	30	6.51	0.4464	Vacant	NO - Privately-Owned	4th and 5th	87			87		No	No	Yes	Yes
4-215	3338 TURNPIKE RD STOCKTON CA 95206	17508018		Commercial	CG(OUTSIDE)	17.5	30	0.34	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		No	No	Yes	Yes
4-216	3350 TURNPIKE RD STOCKTON CA 95206	17508019		Commercial	CG(OUTSIDE)	17.5	30	1	0.4464	Vacant	NO - Privately-Owned	4th and 5th	13			13		No	No	Yes	Yes
4-217	3364 TURNPIKE RD STOCKTON CA 95206	17508020		Commercial	CG(OUTSIDE)	17.5	30	1	0.4464	Vacant	NO - Privately-Owned	4th and 5th	13			13		No	No	Yes	Yes
4-218	3530 MARY AV STOCKTON CA 95206	17513023		Low Density Residential	RL	0	8.7	0.25	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-219	3417 S EL DORADO ST STOCKTON CA 95206	17513045		Low Density Residential	RL	0	8.7	1.33	0.8	Vacant	NO - Privately-Owned			9		9		Yes	No	No	Yes
4-220	193 CLAYTON AV STOCKTON CA 95206	17514007		Low Density Residential	RL	0	8.7	0.66	0.8	Vacant	NO - Privately-Owned			4		4		Yes	No	No	Yes
4-221	3677 MARY AV STOCKTON CA 95206	17514008		Low Density Residential	RL	0	8.7	0.3	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
4-222	234 WAIT AV STOCKTON CA 95206	17514053		Low Density Residential	RL	0	8.7	0.23	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-223	3649 TURNPIKE RD STOCKTON CA 95206	17518012		Low Density Residential	RL	0	8.7	1.29	0.8	Vacant	NO - Privately-Owned	4th and 5th		8		8		No	No	Yes	Yes
4-224	3685 TURNPIKE RD STOCKTON CA 95206	17520002		Low Density Residential	RL	0	8.7	2.71	0.8	Vacant	NO - Privately-Owned	4th and 5th		18		18		No	No	Yes	Yes
4-225	3707 TURNPIKE RD STOCKTON CA 95206	17520003		Low Density Residential	RL	0	8.7	2.9	0.8	Vacant	NO - Privately-Owned	4th and 5th		20		20		No	No	Yes	Yes
4-226	3028 S AIRPORT WY STOCKTON CA 95206	17716534		Medium Density Residential	RM	8.8	17.4	0.13	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-227	3076 S AIRPORT WY STOCKTON CA 95206	17716552		Medium Density Residential	RM	8.8	17.4	0.13	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
4-228	3535 S B ST STOCKTON CA 95206	17721008		Low Density Residential	RM	8.8	17.4	5.52	0.8	Vacant	NO - Privately-Owned			76		76		Yes	No	No	Yes
4-229	3201 GLENHAVEN LN STOCKTON CA 95206	17954011		Low Density Residential	RL	0	8.7	0.29	0.8	Vacant	NO - Privately-Owned				2	2		No	No	No	No
4-230	534 E LAFAYETTE ST STOCKTON CA 95203	14909503	Yes, 4-96, 4-97, 4-230	Commercial	CD(GREATER)	20	90	0.09	0.4464	Vacant	Yes - City Owned	4th and 5th	1		2	3		Yes	No	No	Yes
4-231		16902002	Yes, 4-231 and 4-232	Commercial	CG(OUTSIDE)	17.5	30	0.34	0.4464	Vacant	Yes - City Owned		1		3	4		Yes	No	No	Yes
4-232	1120 FOLSOM ST STOCKTON CA 95206	16904009	Yes, 4-231 and 4-232	Commercial	CG(OUTSIDE)	17.5	30	0.18	0.4464	Vacant	Yes - City Owned				2	2		Yes	No	No	Yes

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5-1	12 S LOS ANGELES AV STOCKTON CA 95203	14505037		Commercial	CN(OUTSIDE)	17.5	30	0.5	0.4464	Vacant	NO - Privately-Owned		6			6		Yes	No	No	Yes
5-2	522 MODESTO AV STOCKTON CA 95203	14517023		Medium Density Residential	RM	8.8	17.4	0.2	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
5-3	409 S STOCKTON ST STOCKTON CA 95203	14524039		Medium Density Residential	RM	8.8	17.4	0.14	0.8	Vacant	NO - Privately-Owned	4th and 5th		1		1		Yes	No	No	Yes
5-4	445 S STOCKTON ST STOCKTON CA 95203	14524041		Low Density Residential	RM	8.8	17.4	0.14	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
5-5	825 W CHURCH ST STOCKTON CA 95203	14524049		Low Density Residential	RM	8.8	17.4	0.23	0.8	Vacant	NO - Privately-Owned			3		3		Yes	No	No	Yes
5-6	325 S STOCKTON ST STOCKTON CA 95203	14525020		Medium Density Residential	RM	8.8	17.4	0.27	0.8	Vacant	NO - Privately-Owned	4th and 5th		3		3		Yes	No	No	Yes
5-7	602 GARFIELD ST STOCKTON CA 95203	14531021		Low Density Residential	RM	8.8	17.4	0.47	0.8	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
5-8	505 GARFIELD ST STOCKTON CA 95203	14531030		Medium Density Residential	RM	8.8	17.4	0.14	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
5-9	519 GARFIELD ST STOCKTON CA 95203	14531031		Medium Density Residential	RM	8.8	17.4	0.14	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
5-10	547 GARFIELD ST STOCKTON CA 95203	14531033		Medium Density Residential	RM	8.8	17.4	0.14	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
5-11	454 S PERSHING AV STOCKTON CA 95203	14531037		Medium Density Residential	RM	8.8	17.4	0.14	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
5-12	512 S PERSHING AV STOCKTON CA 95203	14531038		Medium Density Residential	RM	8.8	17.4	0.14	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
5-13	538 S PERSHING AV STOCKTON CA 95203	14531041		Medium Density Residential	RM	8.8	17.4	0.19	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
6-1	1255 DORAY CT STOCKTON CA 95203	13302047		Medium Density Residential	RM	8.8	17.4	0.14	0.8	Vacant	NO - Privately-Owned			1		1		No	No	No	Yes
6-2	2732 SHIMIZU DR STOCKTON CA 95203	13307006		Medium Density Residential	RM	8.8	17.4	4.67	0.8	Vacant	NO - Privately-Owned	4th and 5th		65		65		No	No	Yes	Yes
6-3	2612 MONTE DIABLO AV STOCKTON CA 95203	13311105		Medium Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned			2		2		No	No	Yes	Yes
6-4	2627 W ACACIA ST STOCKTON CA 95203	13311126		Medium Density Residential	RM	8.8	17.4	0.17	0.8	Vacant	NO - Privately-Owned	4th and 5th		2		2		No	No	Yes	Yes
6-5	906 RYDE AV STOCKTON CA 95203	13311128		Commercial	CN(OUTSIDE)	17.5	30	0.13	0.4464	Vacant	NO - Privately-Owned			1		1		No	No	Yes	Yes
6-6	2519 W FREMONT ST STOCKTON CA 95203	13311208		Medium Density Residential	RM	8.8	17.4	0.13	0.8	Vacant	NO - Privately-Owned			1		1		No	No	Yes	Yes
6-10	112 FRESNO AV STOCKTON CA 95203	14530002		Medium Density Residential	RM	8.8	17.4	0.15	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
7-1	3322 RAINIER AV STOCKTON CA 95204	10906033		Low Density Residential	RL	0	8.7	3.15	0.8	Vacant	NO - Privately-Owned			21		21		No	No	Yes	Yes
7-2	3344 WENDELL AV STOCKTON CA 95204	10906034		Low Density Residential	RL	0	8.7	1.05	0.8	Vacant	NO - Privately-Owned			7		7		No	No	Yes	Yes
7-3	3434 RUMSON AV STOCKTON CA 95204	10910001		Low Density Residential	RL	0	8.7	0.26	0.8	Vacant	NO - Privately-Owned			1		1		No	No	Yes	Yes
7-4	3566 RAINIER AV STOCKTON CA 95204	10911018		Low Density Residential	RL	0	8.7	8.12	0.8	Vacant	NO - Privately-Owned			56		56		No	No	Yes	Yes
7-5	3430 DEER PARK DR STOCKTON CA 95219	11627010		Administrative Professional	CO(OUTSIDE)	17.5	30	2.17	0.4464	Vacant	NO - Privately-Owned	5th	29			29		Yes	No	No	Yes
7-6	3127 W MARCH LN STOCKTON CA 95219	11627013		Administrative Professional	CO(OUTSIDE)	17.5	30	1.54	0.4464	Vacant	NO - Privately-Owned	5th	20			20		Yes	No	No	Yes
7-7	6079 RIVERBANK CI STOCKTON CA 95219	11654034		Low Density Residential	RL	0	8.7	0.29	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
7-8	6101 RIVERBANK CI STOCKTON CA 95219	11654057		Low Density Residential	RL	0	8.7	0.26	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
7-9	4714 ST ANDREWS DR STOCKTON CA 95219	11825017		Low Density Residential	RL	0	8.7	0.34	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
7-10	4347 ST ANDREWS DR STOCKTON CA 95219	11827019		Low Density Residential	RL	0	8.7	0.23	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
7-11	4860 ST ANDREWS DR STOCKTON CA 95219	11839001		Low Density Residential	RL	0	8.7	0.28	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
7-12	4812 ST ANDREWS DR STOCKTON CA 95219	11840009		Low Density Residential	RL	0	8.7	0.33	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
7-13	5501 ST ANDREWS DR STOCKTON CA 95219	11842007		Low Density Residential	RL	0	8.7	0.23	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes

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7-14	2644 WARREN AV STOCKTON CA 95204	12117023		High Density Residential	RH(OUTSIDE)	17.5	30	0.13	0.8	Vacant	NO - Privately-Owned	4th and 5th		3		3		No	No	Yes	Yes
7-15	2142 FONTANA AV STOCKTON CA 95204	12118030		Institutional	RH(OUTSIDE)	17.5	30	2.49	0.8	Vacant	NO - Privately-Owned	4th and 5th	59			59		No	No	Yes	Yes
7-16	2622 DELANO AV STOCKTON CA 95204	12132018		High Density Residential	RH(OUTSIDE)	17.5	30	0.19	0.8	Vacant	NO - Privately-Owned			4		4		No	No	Yes	Yes
8-1	1787 W LINCOLN RD STOCKTON CA 95207	7723040		Low Density Residential	RL	0	8.7	0.23	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
8-2	1132 WILLORA RD STOCKTON CA 95207	7736041		Low Density Residential	RL	0	8.7	0.3	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
8-3	7216 CARAN AV STOCKTON CA 95207	7736043		Low Density Residential	RL	0	8.7	0.29	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
8-4	1084 RIVARA RD STOCKTON CA 95207	7738002		Low Density Residential	RL	0	8.7	0.42	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
8-5	7808 CARAN AV STOCKTON CA 95207	7749034		Low Density Residential	RL	0	8.7	0.63	0.8	Vacant	NO - Privately-Owned				4	4		Yes	No	No	Yes
8-6	232 W PEARL AV STOCKTON CA 95207	8137504		Low Density Residential	RL	0	8.7	0.33	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
8-7	156 E LINCOLN RD STOCKTON CA 95207	8153014		Low Density Residential	RL	0	8.7	2.04	0.8	Vacant	NO - Privately-Owned	4th and 5th		14		14		Yes	No	No	Yes
8-8	6131 N PERSHING AV STOCKTON CA 95207	9729040		High Density Residential	RH(OUTSIDE)	17.5	30	0.43	0.8	Vacant	NO - Privately-Owned	4th and 5th		10		10		Yes	No	No	Yes
8-9	4830 KENTFIELD RD STOCKTON CA 95207	10411017		High Density Residential	RH(OUTSIDE)	17.5	30	0.15	0.8	Vacant	NO - Privately-Owned			3		3		Yes	No	No	Yes
8-10	1545 W LONGVIEW AV && STOCKTON CA 95207	10810040		Low Density Residential	RL	0	8.7	0.27	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
8-11	740 W SWAIN RD STOCKTON CA 95207	10812023		Low Density Residential	RL	0	8.7	0.28	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
8-12	4425 N PERSHING AV STOCKTON CA 95207	11018007		Commercial	CN(OUTSIDE)	17.5	30	0.45	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
8-13	940 ROSE MARIE LN STOCKTON CA 95207	11022006		Administrative Professional	CO(OUTSIDE)	17.5	30	8.93	0.4464	Vacant	NO - Privately-Owned	4th and 5th	119			119		Yes	No	No	Yes
8-14	4444 N PERSHING AV STOCKTON CA 95207	11022017		Administrative Professional	RH(OUTSIDE)	17.5	30	0.44	0.8	Vacant	NO - Privately-Owned	4th and 5th		10		10		Yes	No	No	Yes
8-15	881 W BIANCHI RD STOCKTON CA 95207	11024001		Administrative Professional	CO(OUTSIDE)	17.5	30	0.38	0.4464	Vacant	NO - Privately-Owned	4th and 5th		5		5		Yes	No	No	No
8-16	732 ROSE MARIE LN STOCKTON CA 95207	11024007		Administrative Professional	CO(OUTSIDE)	17.5	30	0.26	0.4464	Vacant	NO - Privately-Owned			3		3		Yes	No	No	No
8-17	752 PODESTO LN STOCKTON CA 95207	11025009		Commercial	CN(OUTSIDE)	17.5	30	0.22	0.4464	Vacant	NO - Privately-Owned			2		2		Yes	No	No	No
8-18	4239 PACIFIC AV STOCKTON CA 95207	11025014		Commercial	CG(OUTSIDE)	17.5	30	0.49	0.4464	Vacant	NO - Privately-Owned	5th		6		6		Yes	No	No	No
9-1	4424 IJAMS RD STOCKTON CA 95210	9605012		Low Density Residential	RL	0	8.7	1.34	0.8	Vacant	NO - Privately-Owned	4th and 5th		9		9		Yes	No	No	No
9-2	1808 E MARCH LN STOCKTON CA 95210	9614016		Commercial	CG(OUTSIDE)	17.5	30	0.61	0.4464	Vacant	NO - Privately-Owned	4th and 5th	8			8		Yes	No	No	Yes
9-3	1756 E MARCH LN STOCKTON CA 95210	9614055		Commercial	CG(OUTSIDE)	17.5	30	3.51	0.4464	Vacant	NO - Privately-Owned	4th and 5th	47			47		Yes	No	No	Yes
9-4	5044 WEST LN STOCKTON CA 95210	9614068		Commercial	CG(OUTSIDE)	17.5	30	2.11	0.4464	Vacant	NO - Privately-Owned	4th and 5th	28			28		Yes	No	No	Yes
9-5	4512 HELENS OAKS CI STOCKTON CA 95210	9632038		Medium Density Residential	RM	8.8	17.4	0.12	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	No
9-6	1080 E MARCH LN STOCKTON CA 95210	10416008		Commercial	CG(OUTSIDE)	17.5	30	1.89	0.4464	Vacant	NO - Privately-Owned	4th and 5th	25			25		Yes	No	No	Yes
9-7	1050 E MARCH LN STOCKTON CA 95210	10416036		Commercial	CG(OUTSIDE)	17.5	30	3.24	0.4464	Vacant	NO - Privately-Owned	4th and 5th	43			43		Yes	No	No	Yes
9-8	1051 CLOWES CT STOCKTON CA 95210	10416040		Commercial	CG(OUTSIDE)	17.5	30	2.2	0.4464	Vacant	NO - Privately-Owned	4th and 5th	29			29		Yes	No	No	Yes
9-9	1 *UNASSIGNED STOCKTON CA 95210	10416041		Commercial	CG(OUTSIDE)	17.5	30	0.35	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	No	No	Yes
9-10	2871 AUTO CENTER CI STOCKTON CA 95212	12803001		Medium Density Residential	RM	8.8	17.4	2.65	0.8	Vacant	NO - Privately-Owned	5th		36		36		Yes	No	No	Yes
9-11	2868 AUTO CENTER CI STOCKTON CA 95212	12803003		Medium Density Residential	RM	8.8	17.4	8.32	0.8	Vacant	NO - Privately-Owned	5th		115		115		Yes	No	No	Yes

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9-12		13004011		High Density Residential	RH(OUTSIDE)	17.5	30	23.96	0.8	Vacant	NO - Privately-Owned		455			455	Units calculated for 18.96 acres. The 5 acres omitted are for the anticipated extension of March Lane east from Holman Road to connect with SR99.	Yes	No	Yes	Yes
9-13	2733 AUTO CENTER CI STOCKTON CA 95212	12803004		Medium Density Residential	RM	8.8	17.4	5.13	0.8	Vacant	NO - Privately-Owned	5th		71		71		Yes	No	No	Yes
11-1	5133 S STATE ROUTE 99 E FR RD STOCKTON CA 95215	17919003		Commercial	CG(OUTSIDE)	17.5	30	0.62	0.4464	Vacant	NO - Privately-Owned	4th and 5th	8			8		No	No	Yes	No
11-2	3411 IMPERIAL WY STOCKTON CA 95215	17926001		Commercial	CG(OUTSIDE)	17.5	30	3.26	0.4464	Vacant	NO - Privately-Owned	4th and 5th	43			43		No	No	Yes	No
11-3	3445 IMPERIAL WY STOCKTON CA 95215	17926002		Commercial	CG(OUTSIDE)	17.5	30	4.8	0.4464	Vacant	NO - Privately-Owned	4th and 5th	64			64		No	No	Yes	No
11-4	4739 S STATE ROUTE 99 E FR RD STOCKTON CA 95215	17926036		Commercial	CG(OUTSIDE)	17.5	30	0.37	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		No	No	No	No
11-5	3449 METRO DR STOCKTON CA 95215	17926056		Commercial	CG(OUTSIDE)	17.5	30	4.83	0.4464	Vacant	NO - Privately-Owned	4th and 5th	64			64		No	No	Yes	No
11-6	4965 S STATE ROUTE 99 E FR RD STOCKTON CA 95205	17931007		Commercial	CG(OUTSIDE)	17.5	30	0.61	0.4464	Vacant	NO - Privately-Owned	4th and 5th	8			8		No	No	No	No
11-7	3486 METRO DR STOCKTON CA 95215	17948004		Commercial	CG(OUTSIDE)	17.5	30	2.4	0.4464	Vacant	NO - Privately-Owned	4th and 5th	32			32		No	No	Yes	No
11-8	4850 S STATE ROUTE 99 E FR RD STOCKTON CA 95215	17948005		Commercial	CG(OUTSIDE)	17.5	30	1.02	0.4464	Vacant	NO - Privately-Owned	4th and 5th	13			13		No	No	Yes	No
11-9	4884 S STATE ROUTE 99 E FR RD STOCKTON CA 95215	17948006		Commercial	CG(OUTSIDE)	17.5	30	2.82	0.4464	Vacant	NO - Privately-Owned	4th and 5th	37			37		No	No	Yes	No
11-10	3651 ARCH RD STOCKTON CA 95215	17948007		Commercial	CG(OUTSIDE)	17.5	30	1.79	0.4464	Vacant	NO - Privately-Owned	4th and 5th	23			23		No	No	Yes	No
11-11	3536 METRO DR STOCKTON CA 95215	17948009		Commercial	CG(OUTSIDE)	17.5	30	1.79	0.4464	Vacant	NO - Privately-Owned		23			23		No	No	Yes	No
11-12	3518 METRO DR STOCKTON CA 95215	17948010		Commercial	CG(OUTSIDE)	17.5	30	1	0.4464	Vacant	NO - Privately-Owned		13			13		No	No	Yes	No
11-13	3498 METRO DR STOCKTON CA 95215	17948011		Commercial	CG(OUTSIDE)	17.5	30	1.17	0.4464	Vacant	NO - Privately-Owned		15			15		No	No	Yes	No
11-14	5783 S FRENCH CAMP RD STOCKTON CA 95206	19302038		Commercial	CG(OUTSIDE)	17.5	30	2.32	0.4464	Vacant	NO - Privately-Owned	4th and 5th	31			31		Yes	No	No	Yes
12-1	2280 W CHARTER WY STOCKTON CA 95206	16302042		Low Density Residential	RL	0	8.7	1.23	0.8	Vacant	NO - Privately-Owned	4th and 5th		8		8		Yes	Yes	No	Yes
12-2	2440 W CHARTER WY STOCKTON CA 95206	16302043		Low Density Residential	RL	0	8.7	13.58	0.8	Vacant	NO - Privately-Owned	4th and 5th		94		94		Yes	Yes	No	Yes
12-3	2313 MANTHEY RD STOCKTON CA 95206	16313009		Low Density Residential	RL	0	8.7	2.44	0.8	Vacant	NO - Privately-Owned	4th and 5th		16		16		Yes	Yes	No	Yes
12-4	2005 S STOCKTON ST STOCKTON CA 95206	16314007		Low Density Residential	RL	0	8.7	2.36	0.8	Vacant	NO - Privately-Owned			16		16		Yes	Yes	No	Yes
12-5	821 W EIGHTH ST STOCKTON CA 95206	16314012		Commercial	CG(OUTSIDE)	17.5	30	8.76	0.4464	Vacant	NO - Privately-Owned	4th and 5th	117			117		Yes	Yes	No	Yes
12-6	741 W EIGHTH ST STOCKTON CA 95206	16314013		Commercial	CG(OUTSIDE)	17.5	30	4.76	0.4464	Vacant	NO - Privately-Owned	4th and 5th	63			63		Yes	Yes	No	Yes
12-7	715 W EIGHTH ST STOCKTON CA 95206	16314014		Commercial	CG(OUTSIDE)	17.5	30	3.74	0.4464	Vacant	NO - Privately-Owned	4th and 5th	50			50		Yes	Yes	No	Yes
12-8	707 W EIGHTH ST STOCKTON CA 95206	16314029		Commercial	CG(OUTSIDE)	17.5	30	0.67	0.4464	Vacant	NO - Privately-Owned	4th and 5th	8			8		Yes	Yes	No	Yes
12-9	803 W EIGHTH ST STOCKTON CA 95206	16314034		Commercial	CG(OUTSIDE)	17.5	30	0.38	0.4464	Vacant	NO - Privately-Owned			5		5		Yes	Yes	No	Yes
12-10	815 W EIGHTH ST STOCKTON CA 95206	16314035		Commercial	CG(OUTSIDE)	17.5	30	0.46	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	Yes	No	Yes
12-11	719 W EIGHTH ST STOCKTON CA 95206	16314044		Commercial	CG(OUTSIDE)	17.5	30	0.33	0.4464	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	Yes	No	Yes

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12-12	1830 S STOCKTON ST STOCKTON CA 95206	16317003		Low Density Residential	RL	0	8.7	0.9	0.8	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	Yes	No	Yes
12-13	1 *UNASSIGNED STOCKTON CA 95206	16317004		Low Density Residential	RL	0	8.7	0.61	0.8	Vacant	NO - Privately-Owned	4th and 5th		4		4		Yes	Yes	No	Yes
12-14	1802 S ARGONAUT ST STOCKTON CA 95206	16319001		Low Density Residential	RL	0	8.7	0.48	0.8	Vacant	NO - Privately-Owned			3		3		Yes	Yes	No	Yes
12-15	1 *UNASSIGNED STOCKTON CA 95206	16319035		Low Density Residential	RL	0	8.7	0.61	0.8	Vacant	NO - Privately-Owned			4		4		Yes	Yes	No	Yes
12-16	1815 S STOCKTON ST STOCKTON CA 95206	16319037		Low Density Residential	RL	0	8.7	0.25	0.8	Vacant	NO - Privately-Owned			1		1		Yes	Yes	No	Yes
12-17	1865 S STOCKTON ST STOCKTON CA 95206	16319039		Low Density Residential	RL	0	8.7	3.6	0.8	Vacant	NO - Privately-Owned			25		25		Yes	Yes	No	Yes
12-18	846 W SECOND ST STOCKTON CA 95206	16321011		Low Density Residential	RL	0	8.7	0.56	0.8	Vacant	NO - Privately-Owned	4th and 5th		3		3		Yes	Yes	No	Yes
12-19	1658 S ARGONAUT ST STOCKTON CA 95206	16322007		Low Density Residential	RL	0	8.7	0.54	0.8	Vacant	NO - Privately-Owned	4th and 5th		3		3		Yes	Yes	No	Yes
12-20	1 *UNASSIGNED STOCKTON CA 95206	16322018		Low Density Residential	RL	0	8.7	0.31	0.8	Vacant	NO - Privately-Owned			2		2		Yes	Yes	No	Yes
12-21	1749 S STOCKTON ST && STOCKTON CA 95206	16322024		Low Density Residential	RL	0	8.7	0.5	0.8	Vacant	NO - Privately-Owned			3		3		Yes	Yes	No	Yes
12-22	1729 S STOCKTON ST STOCKTON CA 95206	16322025		Low Density Residential	RL	0	8.7	0.28	0.8	Vacant	NO - Privately-Owned			1		1		Yes	Yes	No	Yes
12-23	1651 S STOCKTON ST STOCKTON CA 95206	16322031		Low Density Residential	RL	0	8.7	0.94	0.8	Vacant	NO - Privately-Owned			6		6		Yes	Yes	No	Yes
12-24	1638 S ARGONAUT ST STOCKTON CA 95206	16322044		Low Density Residential	RL	0	8.7	0.31	0.8	Vacant	NO - Privately-Owned			2		2		Yes	Yes	No	Yes
12-25	1648 S ARGONAUT ST STOCKTON CA 95206	16322046		Low Density Residential	RL	0	8.7	0.95	0.8	Vacant	NO - Privately-Owned			6		6		Yes	Yes	No	Yes
12-26	2107 WATERCOURSE ST STOCKTON CA 95206	16408001		Low Density Residential	RL	0	8.7	0.35	0.8	Vacant	NO - Privately-Owned			2		2		Yes	Yes	No	Yes
12-28	752 CLOYNE CT STOCKTON CA 95206	16723008		Low Density Residential	RL	0	8.7	0.29	0.8	Vacant	NO - Privately-Owned			2		2		Yes	No	No	Yes
12-29	729 CLOYNE CT STOCKTON CA 95206	16723011		Low Density Residential	RL	0	8.7	0.25	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
12-30	3904 MANTHEY RD STOCKTON CA 95206	19304028		Administrative Professional	CG(OUTSIDE)	17.5	30	8.62	0.4464	Vacant	NO - Privately-Owned	4th and 5th	115			115		No	No	Yes	Yes
12-31	4236 MANTHEY RD STOCKTON CA 95206	19304033		Administrative Professional	CG(OUTSIDE)	17.5	30	12.81	0.4464	Vacant	NO - Privately-Owned			171		171		Yes	No	Yes	Yes
12-32	4586 MANTHEY RD STOCKTON CA 95206	19304034		Administrative Professional	CG(OUTSIDE)	17.5	30	0.69	0.4464	Vacant	NO - Privately-Owned		9			9		Yes	No	No	Yes
12-33	1 *UNASSIGNED STOCKTON CA 95206	19304035		Administrative Professional	CG(OUTSIDE)	17.5	30	0.12	0.4464	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
12-34	4245 MANTHEY RD STOCKTON CA 95206	16817007		High Density Residential	See notes	17.5	30	50.02	See notes	Vacant	NO - Privately-Owned	4th and 5th	626			626	In 2023, the City approved a Tentative Parcel Map to split this into 4 parcels and rezone portions to become: (1) 7.12 ac., CG zone, (2) 10.00 ac., RH zone, (3) 12.16 ac., RH zone and (4) 20.74 ac., RL zone. Only the CG and RH portions are used for unit yield, with realistic capacity modifiers of 44.6% for CG and 80% for RH.	Yes	Yes	No	Yes
12-35	530 MANTHEY RD STOCKTON CA 95206	16819007		Commercial	CL(OUTSIDE)	17.5	30	19.35	0.4464	Vacant	NO - Privately-Owned		259			259		Yes	Yes	No	Yes
12-36	567 W FRENCH CAMP RD STOCKTON CA 95206	16819015		Commercial	CL(OUTSIDE)	17.5	30	12.9	0.4464	Vacant	NO - Privately-Owned		172			172		Yes	Yes	No	Yes
12-37	***454 MANTHEY RD STOCKTON CA 95206***	***16819008***		***Commercial***	***CL(OUTSIDE)***	***17.5***	***30***	***4.96***	***0.4464***	***Vacant***	***NO - Privately-Owned***	***4th and 5th***	***66***			***66***		***Yes***	***Yes***	***No***	***Yes***

Notes: Prescribed densities within the CD, CG, CL, CN, CO and RH zones depends on whether a site is located in the downtown core, the greater downtown or outside of the downtown. For sites in these zones, the entries in the zoning column in the table include "Core" "Greater" or "Outside" to indicate the site's location. Those sites that have been previously identified in two or more consecutive planning periods and do not currently allow residential development by right are denoted in ***bold and italics***.

SITE #	ADDRESS	APN	CONSOLIDATED SITES	GENERAL PLAN	ZONING	MIN. DENSITY	MAX. DENSITY	PARCEL ACREAGE	REALISTIC CAPACITY MODIFIER	SITE STATUS	PUBLICLY-OWNED	IDENTIFIED IN PRIOR PLANNING CYCLE(S)	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE INCOME CAPACITY	TOTAL CAPACITY	NOTES	FEMA 500YR FLOOD	USACE 200YR FLOOD	FEMA 100YR FLOOD	DAM INUN-DATION
12-38	4601 MANTHEY RD STOCKTON CA 95206	16819009		Commercial	CL(OUTSIDE)	17.5	30	1.16	0.4464	Vacant	NO - Privately-Owned		15			15		Yes	Yes	No	Yes
13-1	5324 PASADENA DR STOCKTON CA 95219	6607017		Low Density Residential	RL	0	8.7	0.87	0.8	Vacant	NO - Privately-Owned				6	6		Yes	No	No	Yes
13-2	5358 PASADENA DR STOCKTON CA 95219	6607019		Low Density Residential	RL	0	8.7	0.42	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
13-3	5701 MIRAMONTE WY STOCKTON CA 95219	6615001		Low Density Residential	RL	0	8.7	0.27	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
13-4	5711 MIRAMONTE WY STOCKTON CA 95219	6615002		Low Density Residential	RL	0	8.7	0.31	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
13-5	5713 MIRAMONTE WY STOCKTON CA 95219	6615003		Low Density Residential	RL	0	8.7	0.29	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
13-6	8090 MARINERS DR STOCKTON CA 95219	7118017		Commercial	CG(OUTSIDE)	17.5	30	0.64	0.4464	Vacant	NO - Privately-Owned	4th and 5th	8			8		Yes	No	No	Yes
15-1	10585 DAVIS RD STOCKTON CA 95209	7007011		Low Density Residential	RL	0	8.7	0.77	0.8	Vacant	NO - Privately-Owned	4th and 5th			5	5		Yes	No	No	Yes
15-2	10906 DAVIS RD STOCKTON CA 95209	7009001		Commercial	CG(OUTSIDE)	17.5	30	1.97	0.4464	Vacant	NO - Privately-Owned	4th and 5th	26			26		Yes	No	Yes	Yes
15-3	1106 WHISTLER WY STOCKTON CA 95209	7059069		Low Density Residential	RL	0	8.7	0.55	0.8	Vacant	NO - Privately-Owned				3	3		Yes	No	No	Yes
15-4	10822 ST MORITZ CI STOCKTON CA 95209	7061005		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-5	10826 ST MORITZ CI STOCKTON CA 95209	7061006		Low Density Residential	RL	0	8.7	0.24	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-6	10830 ST MORITZ CI STOCKTON CA 95209	7061007		Low Density Residential	RL	0	8.7	0.24	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-7	10834 ST MORITZ CI STOCKTON CA 95209	7061008		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-8	10838 ST MORITZ CI STOCKTON CA 95209	7061009		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-9	10842 ST MORITZ CI STOCKTON CA 95209	7061010		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-10	10846 ST MORITZ CI STOCKTON CA 95209	7061011		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-11	10850 ST MORITZ CI STOCKTON CA 95209	7061012		Low Density Residential	RL	0	8.7	0.23	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-12	10854 ST MORITZ CI STOCKTON CA 95209	7061013		Low Density Residential	RL	0	8.7	0.48	0.8	Vacant	NO - Privately-Owned				3	3		Yes	No	No	Yes
15-13	10858 ST MORITZ CI STOCKTON CA 95209	7061014		Low Density Residential	RL	0	8.7	0.26	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-14	10862 ST MORITZ CI STOCKTON CA 95209	7061015		Low Density Residential	RL	0	8.7	0.24	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-15	10805 ST MORITZ CI STOCKTON CA 95209	7061027		Low Density Residential	RL	0	8.7	0.24	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-16	10866 ST MORITZ CI STOCKTON CA 95209	7062001		Low Density Residential	RL	0	8.7	0.21	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-17	10874 ST MORITZ CI STOCKTON CA 95209	7062003		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-18	10882 ST MORITZ CI STOCKTON CA 95209	7062005		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-19	10886 ST MORITZ CI STOCKTON CA 95209	7062006		Low Density Residential	RL	0	8.7	0.21	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-20	1330 HEAVENLY CI STOCKTON CA 95209	7064004		Low Density Residential	RL	0	8.7	0.27	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-21	1222 HEAVENLY CI STOCKTON CA 95209	7064020		Low Density Residential	RL	0	8.7	0.31	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-22	1216 HEAVENLY CI STOCKTON CA 95209	7064021		Low Density Residential	RL	0	8.7	0.22	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-23	1211 HEAVENLY CI STOCKTON CA 95209	7064024		Low Density Residential	RL	0	8.7	0.19	0.8	Vacant	NO - Privately-Owned			1		1		Yes	No	No	Yes
15-24	1277 HEAVENLY CI STOCKTON CA 95209	7064029		Low Density Residential	RL	0	8.7	0.24	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-25	1289 HEAVENLY CI STOCKTON CA 95209	7064030		Low Density Residential	RL	0	8.7	0.23	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-26	1313 HEAVENLY CI STOCKTON CA 95209	7064031		Low Density Residential	RL	0	8.7	0.24	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes

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15-27	1345 HEAVENLY CI STOCKTON CA 95209	7064033		Low Density Residential	RL	0	8.7	0.23	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-28	1351 HEAVENLY CI STOCKTON CA 95209	7064034		Low Density Residential	RL	0	8.7	0.26	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-29	1205 HEAVENLY CI STOCKTON CA 95209	7064035		Low Density Residential	RL	0	8.7	0.3	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-30	10652 OCEAN MIST WY STOCKTON CA 95209	7074001		Low Density Residential	RL	0	8.7	0.31	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-31	10640 OCEAN MIST WY STOCKTON CA 95209	7074002		Low Density Residential	RL	0	8.7	0.32	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-32	2809 GOLDEN EAGLE DR STOCKTON CA 95209	7074003		Low Density Residential	RL	0	8.7	0.37	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-33	2801 GOLDEN EAGLE DR STOCKTON CA 95209	7074004		Low Density Residential	RL	0	8.7	0.37	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-34	2741 GOLDEN EAGLE DR STOCKTON CA 95209	7074005		Low Density Residential	RL	0	8.7	0.37	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-35	2729 GOLDEN EAGLE DR STOCKTON CA 95209	7074006		Low Density Residential	RL	0	8.7	0.35	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-36	2717 GOLDEN EAGLE DR STOCKTON CA 95209	7074007		Low Density Residential	RL	0	8.7	0.36	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-37	2705 GOLDEN EAGLE DR STOCKTON CA 95209	7074008		Low Density Residential	RL	0	8.7	0.48	0.8	Vacant	NO - Privately-Owned				3	3		Yes	No	No	Yes
15-38	10636 GREY HAWK CT STOCKTON CA 95209	7074009		Low Density Residential	RL	0	8.7	0.34	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-39	10630 GREY HAWK CT STOCKTON CA 95209	7074010		Low Density Residential	RL	0	8.7	0.31	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-40	10618 GREY HAWK CT STOCKTON CA 95209	7074012		Low Density Residential	RL	0	8.7	0.3	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-41	10612 GREY HAWK CT STOCKTON CA 95209	7074013		Low Density Residential	RL	0	8.7	0.31	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-42	10606 GREY HAWK CT STOCKTON CA 95209	7074014		Low Density Residential	RL	0	8.7	0.37	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-43	10605 GREY HAWK CT STOCKTON CA 95209	7074015		Low Density Residential	RL	0	8.7	0.26	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-44	10611 GREY HAWK CT STOCKTON CA 95209	7074016		Low Density Residential	RL	0	8.7	0.37	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-45	2714 GOLDEN EAGLE DR STOCKTON CA 95209	7074018		Low Density Residential	RL	0	8.7	0.36	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-46	2726 GOLDEN EAGLE DR STOCKTON CA 95209	7074019		Low Density Residential	RL	0	8.7	0.42	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-47	2738 GOLDEN EAGLE DR STOCKTON CA 95209	7074020		Low Density Residential	RL	0	8.7	0.33	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-48	2802 GOLDEN EAGLE DR STOCKTON CA 95209	7074021		Low Density Residential	RL	0	8.7	0.33	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-49	2810 GOLDEN EAGLE DR STOCKTON CA 95209	7074022		Low Density Residential	RL	0	8.7	0.33	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-50	2824 GOLDEN EAGLE DR STOCKTON CA 95209	7074024		Low Density Residential	RL	0	8.7	0.33	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-51	2912 GOLDEN EAGLE DR STOCKTON CA 95209	7074025		Low Density Residential	RL	0	8.7	0.33	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes

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15-52	2920 GOLDEN EAGLE DR STOCKTON CA 95209	7074026		Low Density Residential	RL	0	8.7	0.33	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-53	2928 GOLDEN EAGLE DR STOCKTON CA 95209	7074027		Low Density Residential	RL	0	8.7	0.33	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-54	2936 GOLDEN EAGLE DR STOCKTON CA 95209	7074028		Low Density Residential	RL	0	8.7	0.28	0.8	Vacant	NO - Privately-Owned				1	1		Yes	No	No	Yes
15-55	2944 GOLDEN EAGLE DR STOCKTON CA 95209	7074029		Low Density Residential	RL	0	8.7	0.36	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-56	2947 GOLDEN EAGLE DR STOCKTON CA 95209	7074030		Low Density Residential	RL	0	8.7	0.4	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-57	2939 GOLDEN EAGLE DR STOCKTON CA 95209	7074031		Low Density Residential	RL	0	8.7	0.3	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-58	2931 GOLDEN EAGLE DR STOCKTON CA 95209	7074032		Low Density Residential	RL	0	8.7	0.35	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-59	10637 OCEAN MIST WY STOCKTON CA 95209	7074033		Low Density Residential	RL	0	8.7	0.32	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-60	10651 OCEAN MIST WY STOCKTON CA 95209	7074034		Low Density Residential	RL	0	8.7	0.31	0.8	Vacant	NO - Privately-Owned				2	2		Yes	No	No	Yes
15-61	9473 WEST LN STOCKTON CA 95210	8406010		Low Density Residential	RL	0	8.7	13.57	0.8	Vacant	NO - Privately-Owned			94		94		Yes	No	No	Yes
16-1	7620 WEST LN STOCKTON CA 95210	9404007		Commercial	CG(OUTSIDE)	17.5	30	0.55	0.4464	Vacant	NO - Privately-Owned	4th and 5th	7			7		Yes	No	No	Yes
16-2	8032 DON AV STOCKTON CA 95209	7542006		High Density Residential	RH(OUTSIDE)	17.5	30	0.28	0.8	Vacant	NO - Privately-Owned	4th and 5th		6		6		Yes	No	No	Yes
16-3	2143 WAGNER HEIGHTS RD STOCKTON CA 95209	8027008		Commercial	CG(OUTSIDE)	17.5	30	0.45	0.4464	Vacant	NO - Privately-Owned			6		6		Yes	No	No	Yes
16-4	8955 THORNTON RD STOCKTON CA 95209	8030014		Commercial	CG(OUTSIDE)	17.5	30	1.34	0.4464	Vacant	NO - Privately-Owned	4th and 5th	17			17		Yes	No	Yes	Yes
16-5	9009 THORNTON RD STOCKTON CA 95209	8030015		Commercial	CG(OUTSIDE)	17.5	30	0.95	0.4464	Vacant	NO - Privately-Owned	4th and 5th	12			12		Yes	No	No	Yes
16-6	8601 THORNTON RD STOCKTON CA 95209	8032006		Medium Density Residential	RM	8.8	17.4	3.54	0.8	Vacant	NO - Privately-Owned	4th and 5th		49		49		Yes	No	No	Yes
16-7	1 *UNASSIGNED STOCKTON CA 95209	8032007		Medium Density Residential	RM	8.8	17.4	3.09	0.8	Vacant	NO - Privately-Owned	4th and 5th		43		43		Yes	No	No	Yes
16-8	9051 KELLEY DR STOCKTON CA 95209	8202026		Medium Density Residential	RM	8.8	17.4	0.25	0.8	Vacant	NO - Privately-Owned	4th and 5th		3		3		Yes	No	No	Yes
16-9	1530 E MORADA LN STOCKTON CA 95210	9055064		Commercial	CN(OUTSIDE)	17.5	30	0.77	0.4464	Vacant	NO - Privately-Owned	4th and 5th	10			10		Yes	No	No	Yes
16-10	9450 WEST LN STOCKTON CA 95210	9055065		Commercial	CN(OUTSIDE)	17.5	30	1.92	0.4464	Vacant	NO - Privately-Owned	4th and 5th	25			25		Yes	No	No	Yes
16-11	8404 WEST LN STOCKTON CA 95210	9056001		Administrative Professional	CO(OUTSIDE)	17.5	30	0.73	0.4464	Vacant	NO - Privately-Owned	4th and 5th	9			9		Yes	No	No	Yes
16-12	7007 DANNY DR STOCKTON CA 95210	9437002		Commercial	CG(OUTSIDE)	17.5	30	1.05	0.4464	Vacant	NO - Privately-Owned		14			14		Yes	No	No	Yes
16-13	6303 DANNY DR STOCKTON CA 95210	9437009		Administrative Professional	RH(OUTSIDE)	17.5	30	1.05	0.8	Vacant	NO - Privately-Owned		25			25		Yes	No	No	Yes
16-14	6304 DANNY DR STOCKTON CA 95210	9437027		Administrative Professional	RH(OUTSIDE)	17.5	30	1.98	0.8	Vacant	NO - Privately-Owned		47			47		Yes	No	No	Yes

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Table A-2: Pipeline Projects

PIPELINE PROJECT NAME	ADDRESS	APN	GENERAL PLAN	ZONING	PARCEL ACREAGE	PUBLICLY-OWNED
Alicia Place	1625 TURNPIKE RD STOCKTON CA 95206	16504019	Commercial	CG	3.68	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Alicia Place	76	0	1	77	3.68	
Calaveras Quarters Motel Conversion	2654 W MARCH LN 138 STOCKTON CA 95207	11002008	Commercial	CG	2.14	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Calaveras Quarters Motel Conversion	68	1	0	69	2.14	
Cannery Park	3010 E EIGHT MILE RD STOCKTON CA 95212	12202016	Industrial	IL	19.09	NO - Privately- Owned
Cannery Park	3010 E EIGHT MILE RD && STOCKTON CA 95212	12202017	Industrial	IL	7.12	NO - Privately- Owned
Cannery Park	3400 E EIGHT MILE RD A STOCKTON CA 95212	12202019	Industrial	IL	38.59	NO - Privately- Owned
Cannery Park	3212 E EIGHT MILE RD STOCKTON CA 95212	12202020	Industrial	IL	6.65	NO - Privately- Owned
Cannery Park	10719 HOLMAN RD & STOCKTON CA 95212	12202021	Open Space/Agriculture	OS	3.39	NO - Privately- Owned
Cannery Park	10719 HOLMAN RD STOCKTON CA 95212	12202022	Open Space/Agriculture	OS	10.93	NO - Privately- Owned
Cannery Park	1 *UNASSIGNED STOCKTON CA 95212	12202023	Low Density Residential	RL	3.19	NO - Privately- Owned
Cannery Park	10880 HOLMAN RD STOCKTON CA 95212	12202032	Commercial	CG	12.21	NO - Privately- Owned
Cannery Park	3820 E EIGHT MILE RD STOCKTON CA 95212	12202033	Commercial	CG	19.89	NO - Privately- Owned
Cannery Park	10724 HOLMAN RD STOCKTON CA 95212	12202035	Open Space/Agriculture	OS	11.1	NO - Privately- Owned
Cannery Park	10616 HOLMAN RD STOCKTON CA 95212	12202036	Low Density Residential	RL	9.27	NO - Privately- Owned
Cannery Park	3745 PFC JESSE MIZENER ST STOCKTON CA 95212	12202037	Open Space/Agriculture	OS	1.12	NO - Privately- Owned
Cannery Park		12202038	Commercial	CG	55.88	NO - Privately- Owned
Cannery Park	10524 HOLMAN RD STOCKTON CA 95212	12202039	Low Density Residential	RL	6.59	NO - Privately- Owned
Cannery Park	3860 PFC JESSE MIZENER ST STOCKTON CA 95212	12202040	Low Density Residential	RL	8.99	NO - Privately- Owned
Cannery Park	10509 N STATE ROUTE 99 W FR RD STOCKTON CA 95212	12202043	Commercial	CG	11.89	NO - Privately- Owned
Cannery Park	1 *UNASSIGNED STOCKTON CA 95212	12202046	Low Density Residential	RL	11.51	NO - Privately- Owned
Cannery Park	1 *UNASSIGNED STOCKTON CA 95212	12202048	Low Density Residential	RL	0.72	NO - Privately- Owned
Cannery Park	1 *UNASSIGNED STOCKTON CA 95212	12202049	Low Density Residential	RL	1.43	NO - Privately- Owned
Cannery Park	10311 HOLMAN RD STOCKTON CA 95212	12202050	Low Density Residential	RL	14.39	NO - Privately- Owned
Cannery Park		12202056	Low Density Residential	RL	8.44	NO - Privately- Owned
Cannery Park		12218069	Low Density Residential		0.04	NO - Privately- Owned
Cannery Park		12219001	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12219002	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219003	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219004	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219005	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219006	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219007	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219008	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219009	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219010	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219011	Low Density Residential	RL	0.13	NO - Privately- Owned

PIPELINE PROJECT NAME	ADDRESS	APN	GENERAL PLAN	ZONING	PARCEL ACREAGE	PUBLICLY-OWNED
Cannery Park		12219012	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219013	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219014	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219015	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219016	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219017	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12219018	Low Density Residential	RL	0.19	NO - Privately- Owned
Cannery Park		12219019	Low Density Residential	RL	0.29	NO - Privately- Owned
Cannery Park		12219020	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12219021	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12219022	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12219023	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12219024	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12219025	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12219026	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12219027	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12219028	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12219029	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219030	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12219031	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219032	Low Density Residential	RL	0.23	NO - Privately- Owned
Cannery Park		12219033	Low Density Residential	RL	0.22	NO - Privately- Owned
Cannery Park		12219034	Low Density Residential	RL	0.19	NO - Privately- Owned
Cannery Park		12219035	Low Density Residential	RL	0.18	NO - Privately- Owned
Cannery Park		12219036	Low Density Residential	RL	0.17	NO - Privately- Owned
Cannery Park		12219037	Low Density Residential	RL	0.17	NO - Privately- Owned
Cannery Park		12219038	Low Density Residential	RL	0.16	NO - Privately- Owned
Cannery Park		12219039	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12219040	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12219041	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12219042	Low Density Residential	RL	0.2	NO - Privately- Owned
Cannery Park		12219043	Low Density Residential	RL	0.28	NO - Privately- Owned
Cannery Park		12219044	Low Density Residential	RL	0.18	NO - Privately- Owned
Cannery Park		12219045	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219046	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219047	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219048	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12219049	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219050	Low Density Residential	RL	0.13	NO - Privately- Owned

PIPELINE PROJECT NAME	ADDRESS	APN	GENERAL PLAN	ZONING	PARCEL ACREAGE	PUBLICLY-OWNED
Cannery Park		12219051	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219052	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219053	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219054	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219055	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219056	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219057	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219058	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219059	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219060	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12219061	Low Density Residential	RL	0.16	NO - Privately- Owned
Cannery Park		12219062	Low Density Residential	RL	0.16	NO - Privately- Owned
Cannery Park		12219063	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219064	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219065	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219066	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219067	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219068	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219069	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219070	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219071	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219072	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12219073	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12220001	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12220002	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12220003	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12220004	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12220005	Low Density Residential	RL	0.18	NO - Privately- Owned
Cannery Park		12220006	Low Density Residential	RL	0.18	NO - Privately- Owned
Cannery Park		12220007	Low Density Residential	RL	0.16	NO - Privately- Owned
Cannery Park		12220008	Low Density Residential	RL	0.16	NO - Privately- Owned
Cannery Park		12220009	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12220010	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220011	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12220012	Low Density Residential	RL	0.16	NO - Privately- Owned
Cannery Park		12220013	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12220014	Low Density Residential	RL	0.22	NO - Privately- Owned
Cannery Park		12220015	Low Density Residential	RL	0.41	NO - Privately- Owned
Cannery Park		12220016	Low Density Residential	RL	0.19	NO - Privately- Owned
Cannery Park		12220017	Low Density Residential	RL	0.12	NO - Privately- Owned

PIPELINE PROJECT NAME	ADDRESS	APN	GENERAL PLAN	ZONING	PARCEL ACREAGE	PUBLICLY-OWNED
Cannery Park		12220018	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220019	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220020	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220021	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220022	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220023	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220024	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220025	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220026	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220027	Low Density Residential	RL	0.18	NO - Privately- Owned
Cannery Park		12220028	Low Density Residential	RL	0.19	NO - Privately- Owned
Cannery Park		12220029	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220030	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220031	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220032	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220033	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220034	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220035	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220036	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220037	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220038	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220039	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220040	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220041	Low Density Residential	RL	0.24	NO - Privately- Owned
Cannery Park		12220042	Low Density Residential	RL	0.18	NO - Privately- Owned
Cannery Park		12220043	Low Density Residential	RL	0.19	NO - Privately- Owned
Cannery Park		12220044	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12220045	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12220046	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220047	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220048	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220049	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220050	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220051	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12220052	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220053	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220054	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220055	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220056	Low Density Residential	RL	0.13	NO - Privately- Owned

PIPELINE PROJECT NAME	ADDRESS	APN	GENERAL PLAN	ZONING	PARCEL ACREAGE	PUBLICLY-OWNED
Cannery Park		12220057	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220058	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220059	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220060	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220061	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12220062	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12220063	Low Density Residential	RL	0.17	NO - Privately- Owned
Cannery Park		12221001	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221002	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221003	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221004	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12221005	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221006	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221007	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221008	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221009	Low Density Residential	RL	0.19	NO - Privately- Owned
Cannery Park		12221010	Low Density Residential	RL	0.23	NO - Privately- Owned
Cannery Park		12221011	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221012	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221013	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221014	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221015	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221016	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221017	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221018	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221019	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221020	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221021	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221022	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221023	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221024	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12221025	Low Density Residential	RL	0.24	NO - Privately- Owned
Cannery Park		12221026	Low Density Residential	RL	0.18	NO - Privately- Owned
Cannery Park		12221027	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221028	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221029	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221030	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221031	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12221032	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12221033	Low Density Residential	RL	0.13	NO - Privately- Owned

PIPELINE PROJECT NAME	ADDRESS	APN	GENERAL PLAN	ZONING	PARCEL ACREAGE	PUBLICLY-OWNED
Cannery Park		12221034	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221035	Low Density Residential	RL	0.2	NO - Privately- Owned
Cannery Park		12221036	Low Density Residential	RL	0.2	NO - Privately- Owned
Cannery Park		12221037	Low Density Residential	RL	0.25	NO - Privately- Owned
Cannery Park		12221038	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12221039	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221040	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12221041	Low Density Residential	RL	0.16	NO - Privately- Owned
Cannery Park		12221042	Low Density Residential	RL	0.16	NO - Privately- Owned
Cannery Park		12221043	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221044	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221045	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221046	Low Density Residential	RL	0.23	NO - Privately- Owned
Cannery Park		12221047	Low Density Residential	RL	0.18	NO - Privately- Owned
Cannery Park		12221048	Low Density Residential	RL	0.23	NO - Privately- Owned
Cannery Park		12221049	Low Density Residential	RL	0.15	NO - Privately- Owned
Cannery Park		12221050	Low Density Residential	RL	0.12	NO - Privately- Owned
Cannery Park		12221051	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12221052	Low Density Residential	RL	0.14	NO - Privately- Owned
Cannery Park		12221053	Low Density Residential	RL	0.16	NO - Privately- Owned
Cannery Park		12221054	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221055	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221056	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221057	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221058	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221059	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221060	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221061	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221062	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221063	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221064	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221065	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221066	Low Density Residential	RL	0.13	NO - Privately- Owned
Cannery Park		12221067	Low Density Residential	RL	0.13	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Cannery Park	0	32	490	522	291.8	
Crystal Bay	1 *UNASSIGNED STOCKTON CA 95219	6606001	Medium Density Residential	RM	49.9	NO - Privately- Owned
Crystal Bay	1 *UNASSIGNED STOCKTON CA 95219	6606002	Low Density Residential	RL	62.63	NO - Privately- Owned
Crystal Bay	7544 W EIGHT MILE RD STOCKTON CA 95219	6606003	Medium Density Residential	RM	61.53	NO - Privately- Owned

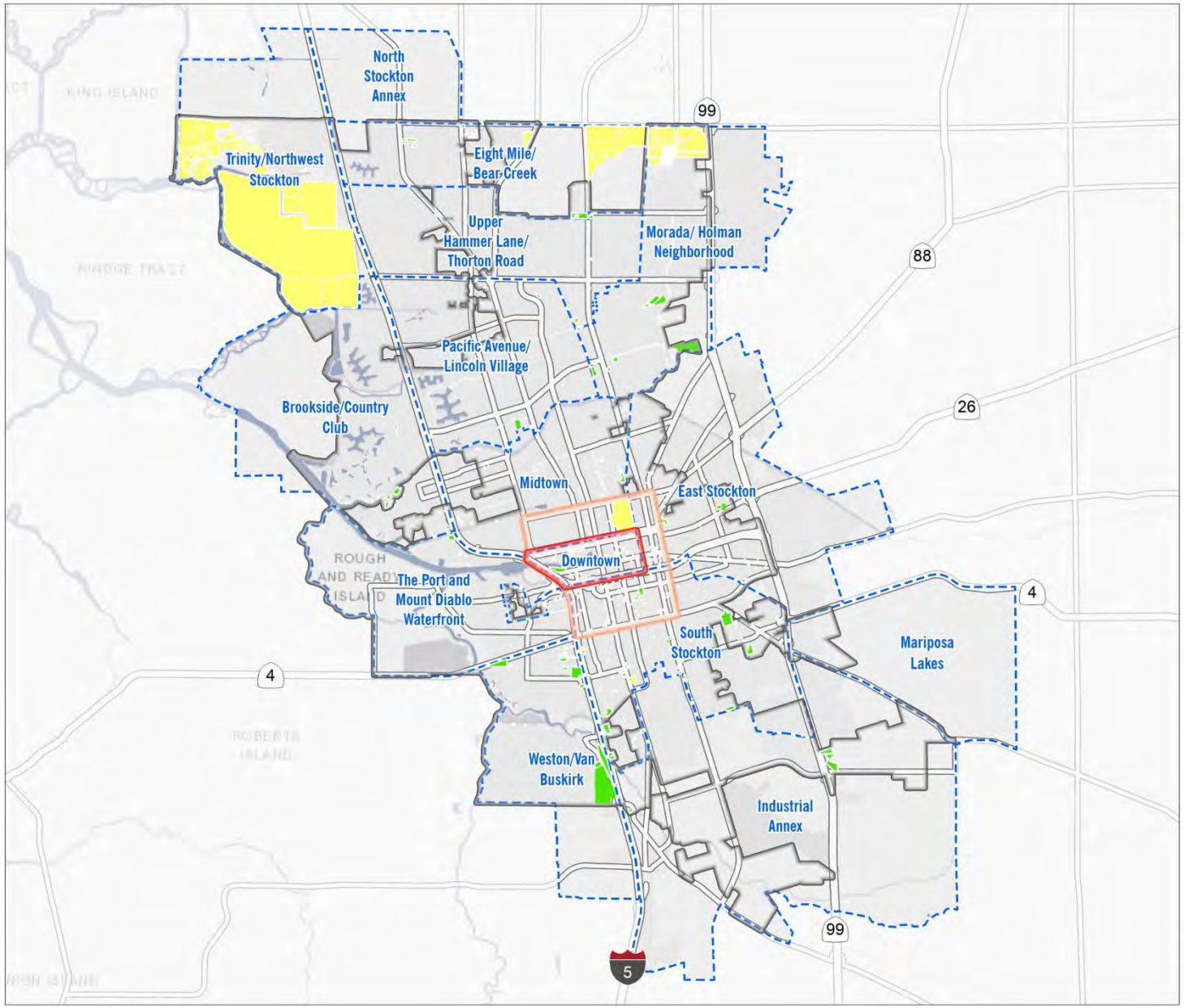
PIPELINE PROJECT NAME	ADDRESS	APN	GENERAL PLAN	ZONING	PARCEL ACREAGE	PUBLICLY-OWNED
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Crystal Bay	0	67	1,276	1,343	174	
Delta Cove	9821 N I 5 W FR RD STOCKTON CA 95219	7117002	Low Density Residential	RL	259.52	NO - Privately- Owned
Delta Cove	1 *UNASSIGNED STOCKTON CA 95219	7117004	Low Density Residential	RL	50	NO - Privately- Owned
Delta Cove	1 *UNASSIGNED STOCKTON CA 95219	7117005	Low Density Residential	RL	50	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Delta Cove	0	77	1,468	1,545	359.52	
Elderberry Residential Project		8404005	High Density Residential	RH	12.46	NO - Privately- Owned
Elderberry Residential Project	10601 N LOWER SACRAMENTO RD STOCKTON CA 95209	8404007	Low Density Residential	RL	6.34	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Elderberry Residential Project	0	0	42	42	18.8	
Fairview Terrace	2244 S AIRPORT WY STOCKTON CA 95206	16915101	Commercial	CG(OUTSIDE)	0.9	NO - Privately- Owned
Fairview Terrace	2226 S AIRPORT WY STOCKTON CA 95206	16916301	Commercial	CG(OUTSIDE)	0.71	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Fairview Terrace	76	0	0	76	1.61	
Grand View Village		13913028	Commercial	CD	0.79	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Grand View Village	75	0	0	75	0.79	
Harding Apartments	645 W HARDING WY 15A STOCKTON CA 95204	13705006	Administrative Professional	CO	1.02	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Harding Apartments	0	4	18	22	1.02	
Hunter House New Apartments	610 N HUNTER ST STOCKTON CA 95202	13906033	Commercial	CD	0.69	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Hunter House New Apartments	120	0	0	120	0.69	
La Passeggiata Affordable Housing Project	622 E LINDSAY ST STOCKTON CA 95202	13931025	Commercial	CD	0.83	YES - State-Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
La Passeggiata Affordable Housing Project	94	0	0	94	0.83	
Mobile Homes On El Dorado	2424 S EL DORADO ST STOCKTON CA 95206	16707028	High Density Residential	RH	7.06	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Mobile Homes On El Dorado	0	18	104	122	7.06	
Park Center Apartments		13718030	High Density Residential	CN	0.81	NO - Privately- Owned
Park Center Apartments	21 W PARK ST STOCKTON CA 95202	13718031	High Density Residential	RH	0.17	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Park Center Apartments	50	0	1	51	0.98	
Sanctuary		7113013	Mixed Use	MX	1546.17	NO - Privately- Owned
Sanctuary		7113015	Mixed Use	MX	1.73	NO - Privately- Owned
Sanctuary		7113016	Mixed Use	MX	205.92	NO - Privately- Owned
Sanctuary		7113017	Mixed Use	MX	79.49	NO - Privately- Owned
Sanctuary		7113018	Mixed Use	MX	110.86	NO - Privately- Owned
Sanctuary		7113019	Mixed Use	MX	6.29	NO - Privately- Owned

PIPELINE PROJECT NAME	ADDRESS	APN	GENERAL PLAN	ZONING	PARCEL ACREAGE	PUBLICLY-OWNED
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Sanctuary	0	0	5,758	5,758	1,950	
Sonora Square Apartments	E. Sonora Street between S. Center Street and S. El Dorado Street	14906217	Commercial	CD	0.92	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Sonora Square Apartments	37	0	0	37	0.92	
Swain Crossing Apartments	6045 TAM O SHANTER DR STOCKTON CA 95210	9405008	High Density Residential	RH	1.58	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Swain Crossing Apartments	0	5	31	36	1.58	
Tra Vigne		12002001	Commercial	CG	0.92	NO - Privately- Owned
Tra Vigne		12002002	Low Density Residential	RL	83.08	NO - Privately- Owned
Tra Vigne		12002003	Low Density Residential	RL	38.34	NO - Privately- Owned
Tra Vigne		12002013	Industrial	IG	5.29	NO - Privately- Owned
Tra Vigne		12002014	Industrial	IG	10.28	NO - Privately- Owned
Tra Vigne		12002015	Low Density Residential	RL	98.02	NO - Privately- Owned
Tra Vigne		12002017	Low Density Residential	OS	25.53	NO - Privately- Owned
Tra Vigne		12002018	Low Density Residential	RL	5.68	NO - Privately- Owned
Tra Vigne		12002019	Low Density Residential	RL	12.66	NO - Privately- Owned
Tra Vigne		12002022	Low Density Residential	RL	20.21	NO - Privately- Owned
Tra Vigne		12002023	Low Density Residential	RL	12.97	NO - Privately- Owned
Tra Vigne		12201002	Low Density Residential	RL	2.84	NO - Privately- Owned
Tra Vigne		12201004	Low Density Residential	RL	2.23	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Tra Vigne	0	0	1,503	1,503	318.05	
Trinity Parkway Apartments	5215 COSUMNES DR STOCKTON CA 95219	6602008	Mixed Use	MX	4.32	NO - Privately- Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
Trinity Parkway Apartments	0	18	102	120	4.32	
University Park		13921008	Mixed Use	MX	103.47	YES - State-Owned
Project Summary	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Total Acres	
University Park	0	0	359	359	103.47	
Westlake at Spanos Park	1 *UNASSIGNED STOCKTON CA 95219	6605014	Mixed Use	MX	20.77	NO - Privately- Owned
Westlake at Spanos Park	1 *UNASSIGNED STOCKTON CA 95219	6605015	Mixed Use	MX	0	NO - Privately- Owned
Westlake at Spanos Park	5836 MELONES WY STOCKTON CA 95219	6633004	Mixed Use	MX	0.14	NO - Privately- Owned
Westlake at Spanos Park	10306 HADDONFIELD LN STOCKTON CA 95219	6633022	Mixed Use	MX	0.13	NO - Privately- Owned
Westlake at Spanos Park	10345 HADDONFIELD LN STOCKTON CA 95219	6633026	Mixed Use	MX	0.16	NO - Privately- Owned
Westlake at Spanos Park	10302 JERICHO DR STOCKTON CA 95219	6634016	Mixed Use	MX	0.15	NO - Privately- Owned
Westlake at Spanos Park	10129 BAY HARBOR DR STOCKTON CA 95219	6635040	Mixed Use	MX	0.12	NO - Privately- Owned
Westlake at Spanos Park	10113 CAPETOWN LN STOCKTON CA 95219	6636028	Mixed Use	MX	0.12	NO - Privately- Owned
Westlake at Spanos Park	5920 GREY GULL WY STOCKTON CA 95219	6636044	Mixed Use	MX	0.5	NO - Privately- Owned
Westlake at Spanos Park	5944 DUCK COVE LN STOCKTON CA 95219	6637047	Mixed Use	MX	0.1	NO - Privately- Owned

PIPELINE PROJECT NAME	ADDRESS	APN	GENERAL PLAN	ZONING	PARCEL ACREAGE	PUBLICLY-OWNED
Westlake at Spanos Park	10554 BERRY COVE WY STOCKTON CA 95219	6638005	Mixed Use	MX	0.09	NO - Privately- Owned
Westlake at Spanos Park	10534 SEAHORN DR STOCKTON CA 95219	6638023	Mixed Use	MX	0.09	NO - Privately- Owned
Westlake at Spanos Park	5945 MELONES WY STOCKTON CA 95219	6639005	Mixed Use	MX	0.08	NO - Privately- Owned
Westlake at Spanos Park	5829 MELONES WY STOCKTON CA 95219	6639038	Mixed Use	MX	0.08	NO - Privately- Owned
Westlake at Spanos Park	5862 PEBBLESTONE LN STOCKTON CA 95219	6639062	Mixed Use	MX	0.09	NO - Privately- Owned
Westlake at Spanos Park		6641056	Mixed Use	MX	0.12	NO - Privately- Owned
Westlake at Spanos Park		6641070	Mixed Use	MX	0.12	NO - Privately- Owned
Westlake at Spanos Park		6642004	Mixed Use	MX	0.14	NO - Privately- Owned
Westlake at Spanos Park		6642014	Mixed Use	MX	0.12	NO - Privately- Owned
Westlake at Spanos Park		6642028	Mixed Use	MX	0.13	NO - Privately- Owned
Westlake at Spanos Park		6642042	Mixed Use	MX	0.12	NO - Privately- Owned
Westlake at Spanos Park		6642084	Mixed Use	MX	0.14	NO - Privately- Owned
Westlake at Spanos Park		6644028	Mixed Use	MX	0.12	NO - Privately- Owned
Westlake at Spanos Park		6645053	Mixed Use	MX	0.12	NO - Privately- Owned
Westlake at Spanos Park		6645069	Mixed Use	MX	0.28	NO - Privately- Owned
Westlake at Spanos Park		6646028	Mixed Use	MX	0.12	NO - Privately- Owned
Westlake at Spanos Park		6646038	Mixed Use	MX	0.11	NO - Privately- Owned
Westlake at Spanos Park		6649048	Mixed Use	MX	2.16	NO - Privately- Owned
Westlake at Spanos Park		6649047	Mixed Use	MX	2.23	NO - Privately- Owned
Westlake at Spanos Park		6649046	Mixed Use	MX	4.76	NO - Privately- Owned
Westlake at Spanos Park		6647002	Mixed Use	MX	16.27	NO - Privately- Owned
Westlake at Spanos Park		6646045	Mixed Use	MX	1.24	NO - Privately- Owned
Westlake at Spanos Park		6605072	Mixed Use	MX	7.8	NO - Privately- Owned
Westlake at Spanos Park		6605071	Mixed Use	MX	24.41	NO - Privately- Owned
Westlake at Spanos Park		6605070	Mixed Use	MX	39.49	NO - Privately- Owned
Westlake at Spanos Park		6605069	Mixed Use	MX	23.1	NO - Privately- Owned
Westlake at Spanos Park		6605068	Mixed Use	MX	20.75	NO - Privately- Owned
Westlake at Spanos Park		6605066	Mixed Use	MX	15.04	NO - Privately- Owned
Westlake at Spanos Park		6605060	Mixed Use	MX	0.43	NO - Privately- Owned
Westlake at Spanos Park	1 *UNASSIGNED STOCKTON CA 95219	6605054	Mixed Use	MX	0.69	NO - Privately- Owned
Westlake at Spanos Park	1 *UNASSIGNED STOCKTON CA 95219	6605051	Mixed Use	MX	1.68	NO - Privately- Owned
Westlake at Spanos Park	1 *UNASSIGNED STOCKTON CA 95219	6605047	Mixed Use	MX	10.35	NO - Privately- Owned
Westlake at Spanos Park	7969 DEL WEBB CI STOCKTON CA 95219	6605046	Mixed Use	MX	26.93	NO - Privately- Owned
Westlake at Spanos Park	1 *UNASSIGNED STOCKTON CA 95219	6605045	Mixed Use	MX	35.04	NO - Privately- Owned
Westlake at Spanos Park	1 *UNASSIGNED STOCKTON CA 95219	6605043	Mixed Use	MX	16.57	NO - Privately- Owned
Westlake at Spanos Park	7970 DEL WEBB CI STOCKTON CA 95219	6605042	Mixed Use	MX	19.36	NO - Privately- Owned
Westlake at Spanos Park	1 *UNASSIGNED STOCKTON CA 95219	6605041	Mixed Use	MX	2.36	NO - Privately- Owned
Westlake at Spanos Park	1 *UNASSIGNED STOCKTON CA 95219	6605036	Mixed Use	MX	2.73	NO - Privately- Owned
Westlake at Spanos Park	1 *UNASSIGNED STOCKTON CA 95219	6605035	Mixed Use	MX	4.1	NO - Privately- Owned
Westlake at Spanos Park	1 *UNASSIGNED STOCKTON CA 95219	6605033	Mixed Use	MX	13.31	NO - Privately- Owned

PIPELINE PROJECT NAME	ADDRESS	APN	GENERAL PLAN	ZONING	PARCEL ACREAGE	PUBLICLY-OWNED
Westlake at Spanos Park	*1 *UNASSIGNED STOCKTON CA 95219*	*6605032*	*Mixed Use*	*MX*	*10.54*	*NO - Privately- Owned*
Westlake at Spanos Park	*1 *UNASSIGNED STOCKTON CA 95219*	*6605031*	*Mixed Use*	*MX*	*2.21*	*NO - Privately- Owned*
Westlake at Spanos Park	*1 *UNASSIGNED STOCKTON CA 95219*	*6605020*	*Mixed Use*	*MX*	*4.59*	*NO - Privately- Owned*
Westlake at Spanos Park	*1 *UNASSIGNED STOCKTON CA 95219*	*6605016*	*Mixed Use*	*MX*	*14.68*	*NO - Privately- Owned*
Project Summary	*Lower Income Capacity*	*Moderate Income Capacity*	*Above Moderate Income Capacity*	*Total Capacity*	*Total Acres*	
Westlake at Spanos Park	*0*	*131*	*2,621*	*2,752*	*347.08*	

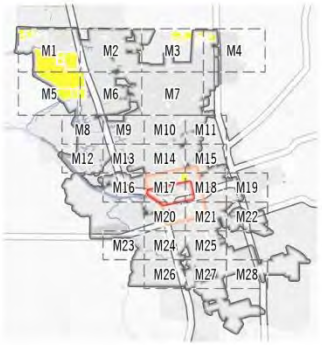
Sites Inventory Map Citywide



Stockton City Limits
Stockton Neighborhoods
Downtown Core
Greater Downtown

Housing Site
Pipeline Project
Vacant Site

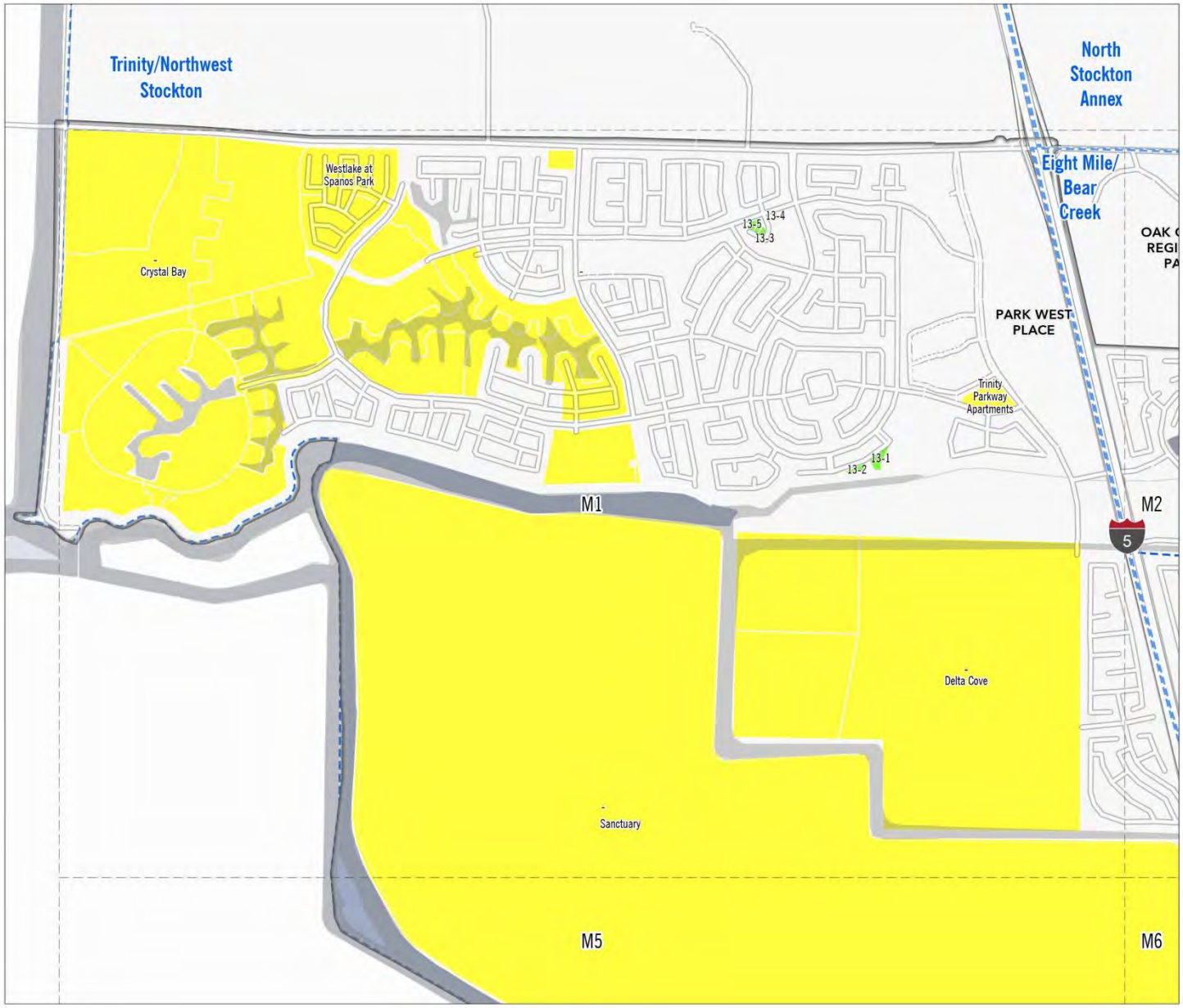
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 10,000 20,000
Feet

Revision Date: 11/20/2023

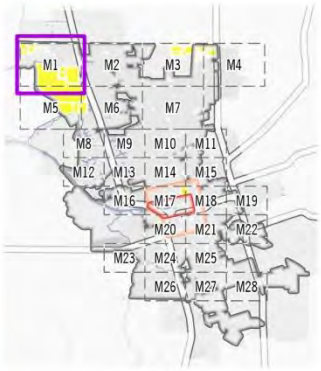
Sites Inventory Map M1



Stockton City Limits
Stockton Neighborhoods

Housing Site
Pipeline Project
Vacant Site

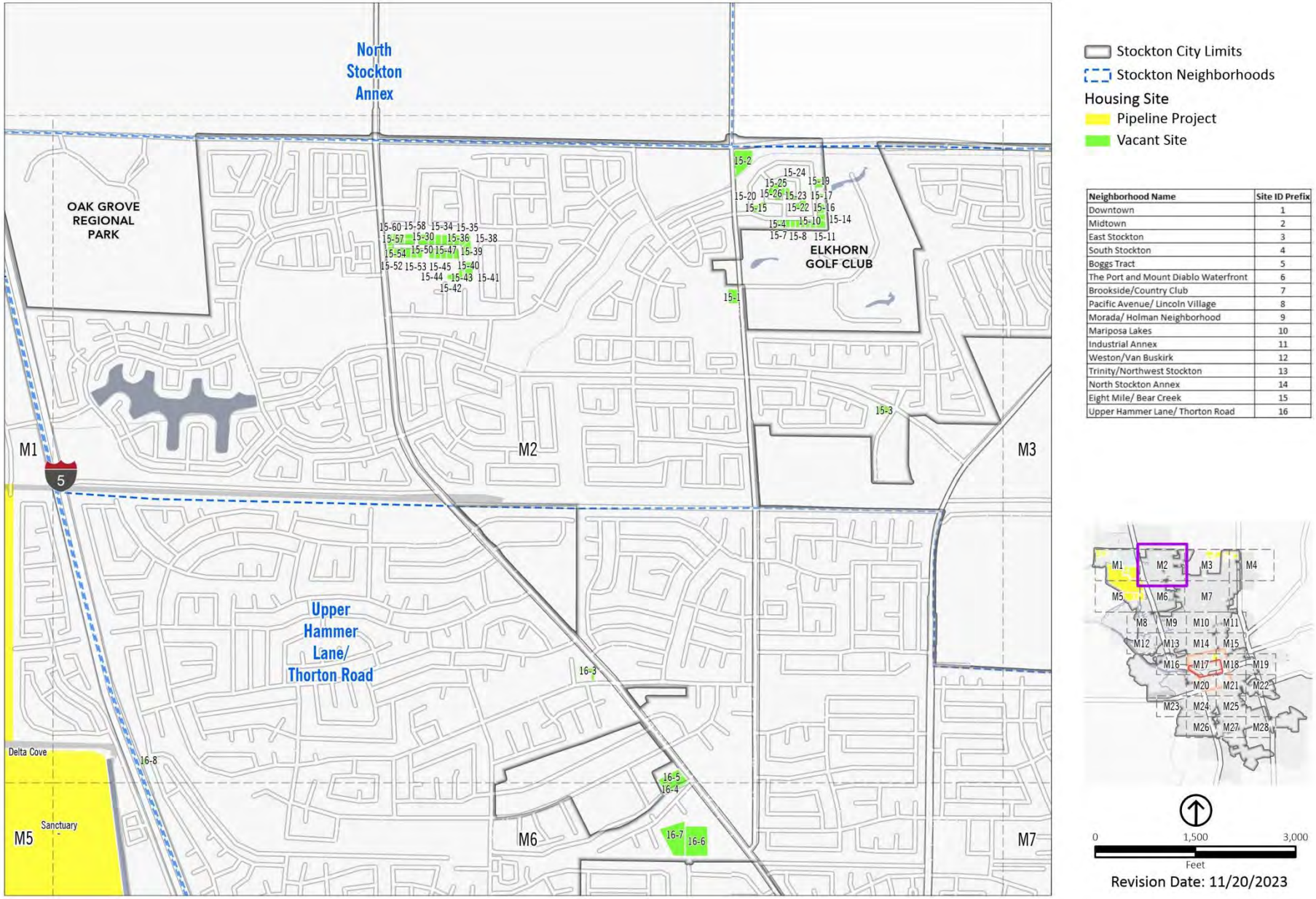
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



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Revision Date: 11/20/2023

Sites Inventory Map M2

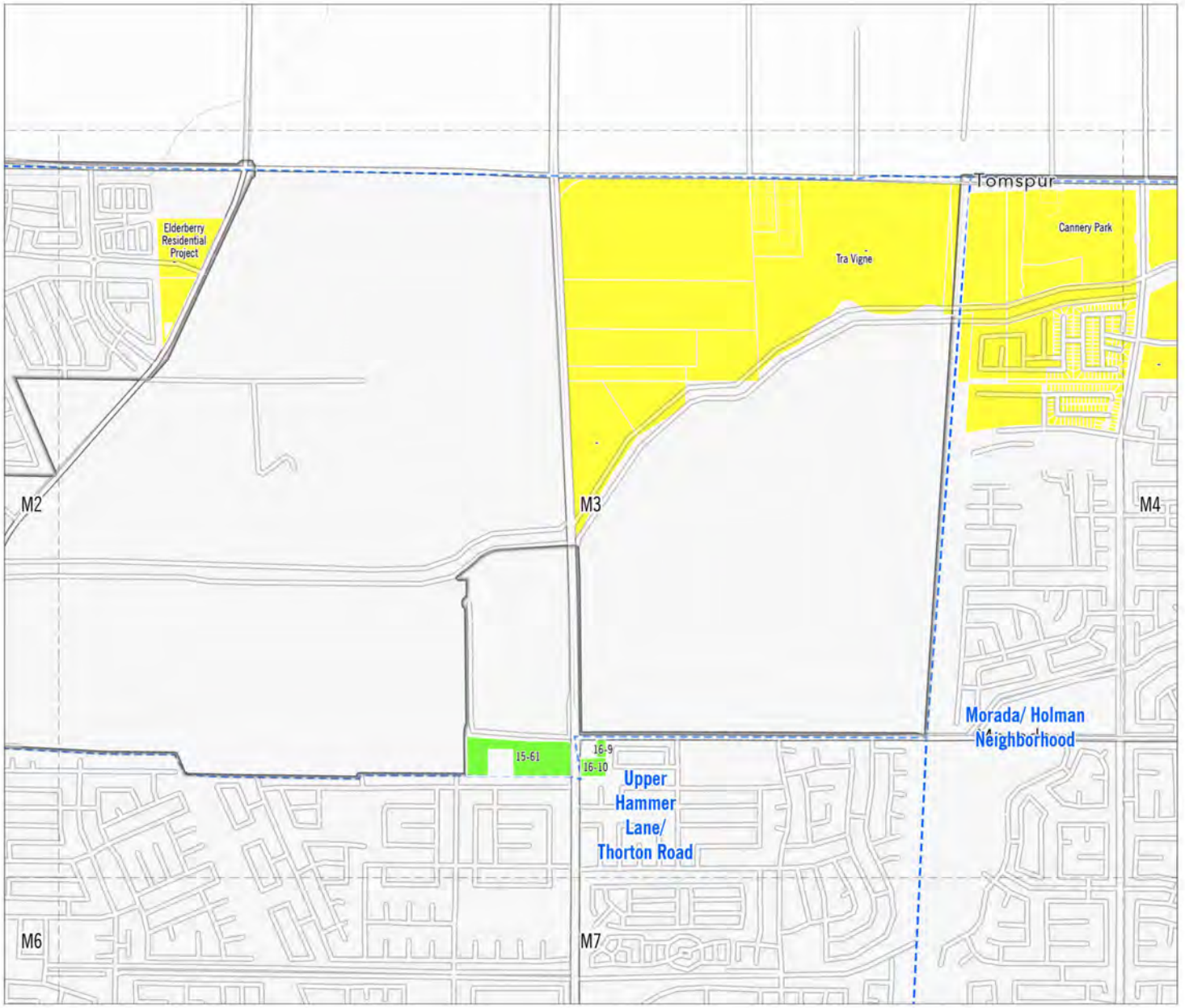


Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16

0 1,500 3,000
Feet

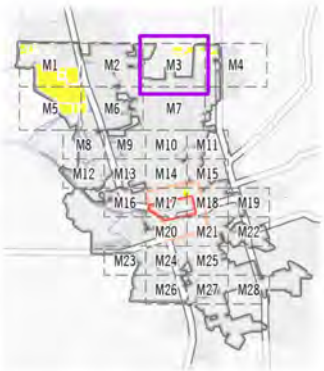
Revision Date: 11/20/2023

Sites Inventory Map M3



Stockton City Limits
Stockton Neighborhoods
Housing Site
Pipeline Project
Vacant Site

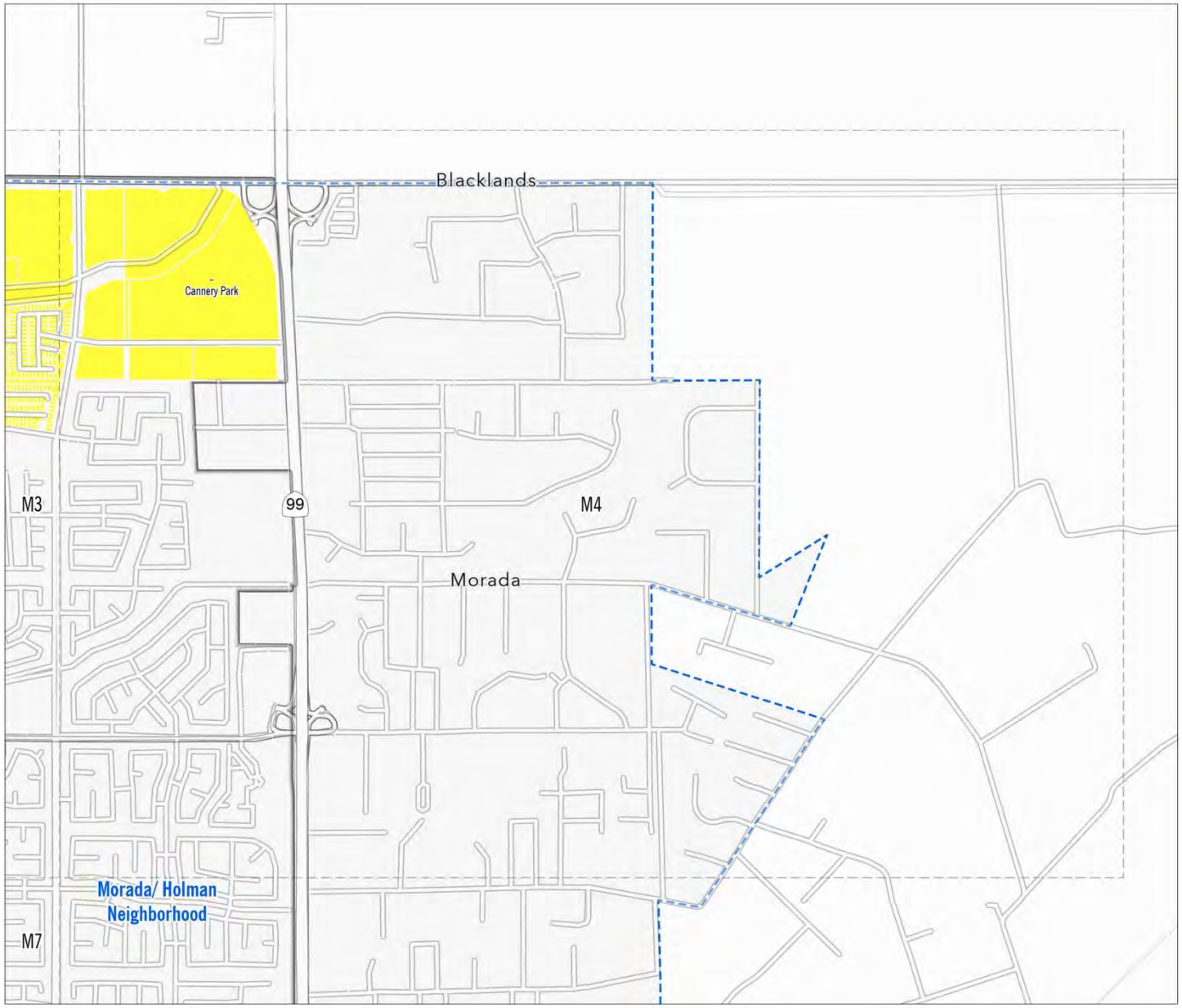
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,500 3,000
Feet

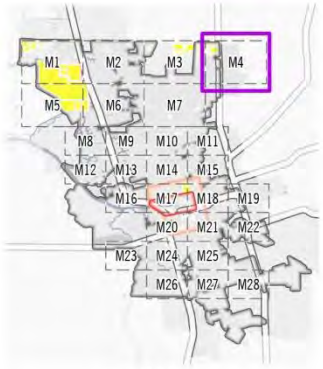
Revision Date: 11/20/2023

Sites Inventory Map M4



Stockton City Limits
Stockton Neighborhoods
Housing Site
Pipeline Project

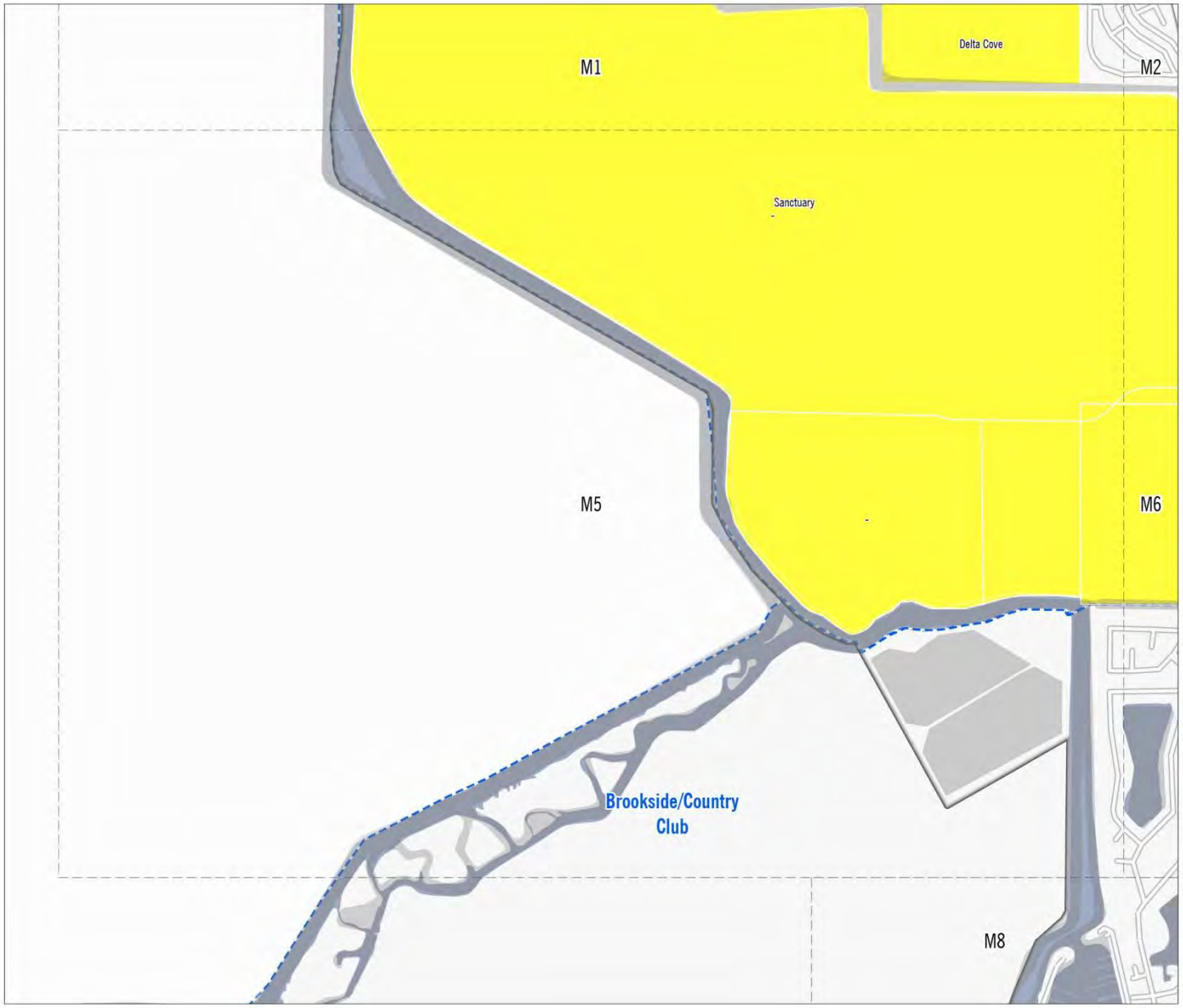
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,500 3,000
Feet

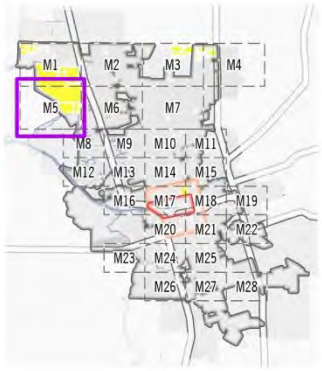
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Sites Inventory Map M5



Stockton City Limits
Stockton Neighborhoods
Housing Site
Pipeline Project

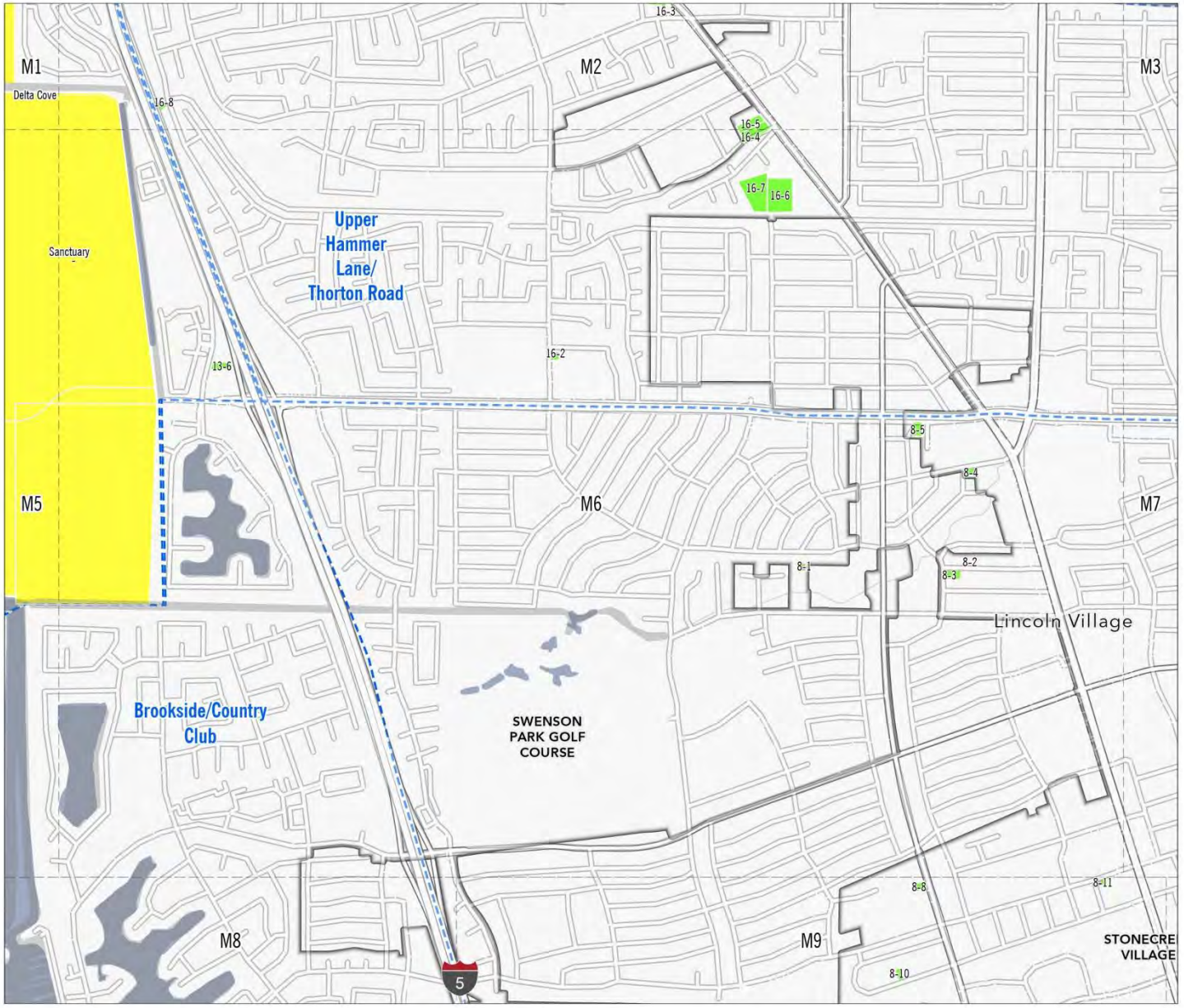
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
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Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,500 3,000
Feet

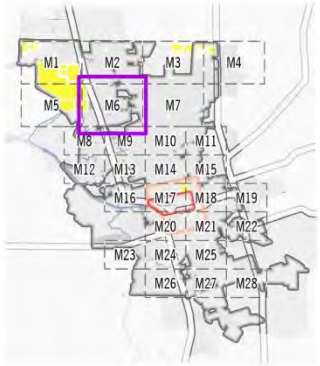
Revision Date: 11/20/2023

Sites Inventory Map M6



Stockton City Limits
Stockton Neighborhoods
Housing Site
Pipeline Project
Vacant Site

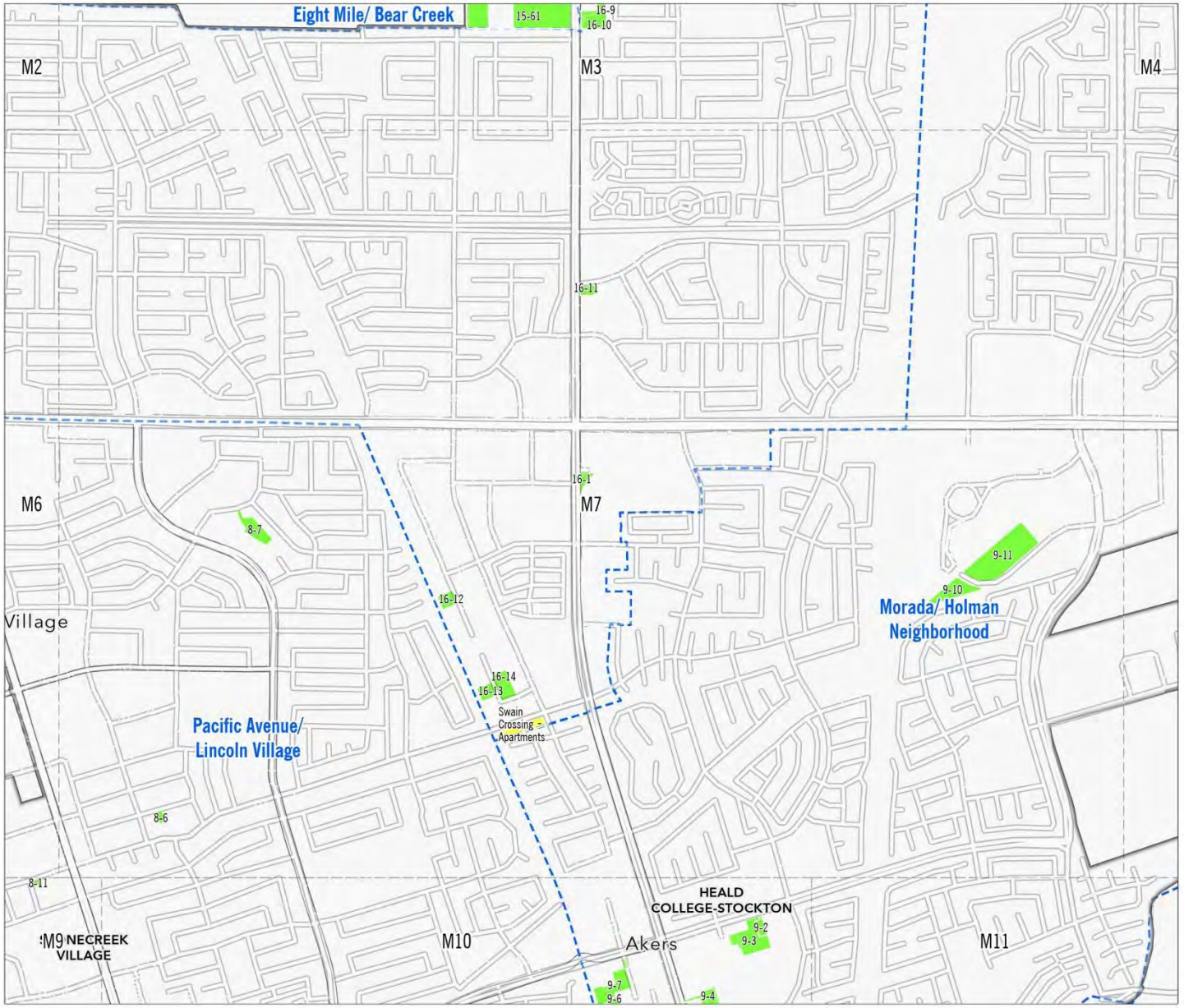
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,500 3,000
Feet

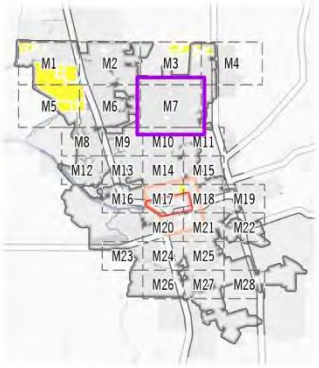
Revision Date: 11/20/2023

Sites Inventory Map M7



Stockton City Limits
Stockton Neighborhoods
Housing Site
Pipeline Project
Vacant Site

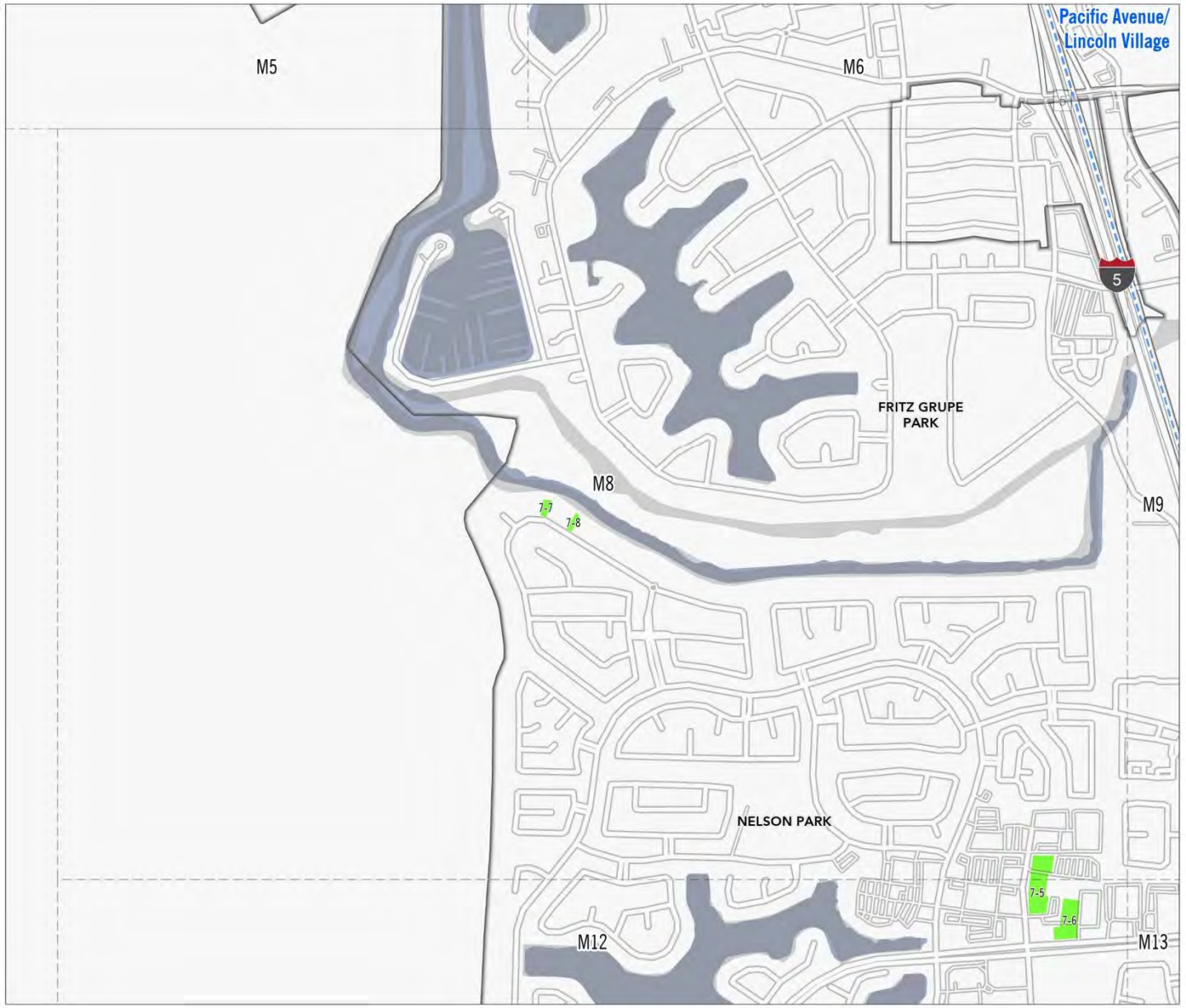
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
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Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,500 3,000
Feet

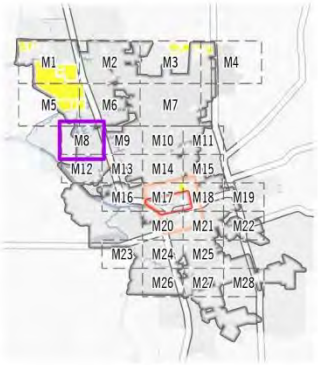
Revision Date: 11/20/2023

Sites Inventory Map M8



Stockton City Limits
Stockton Neighborhoods
Housing Site
Vacant Site

Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

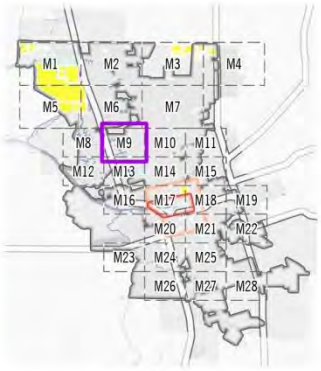
Revision Date: 11/20/2023

Sites Inventory Map M9



Stockton City Limits
Stockton Neighborhoods
Housing Site
Pipeline Project
Vacant Site

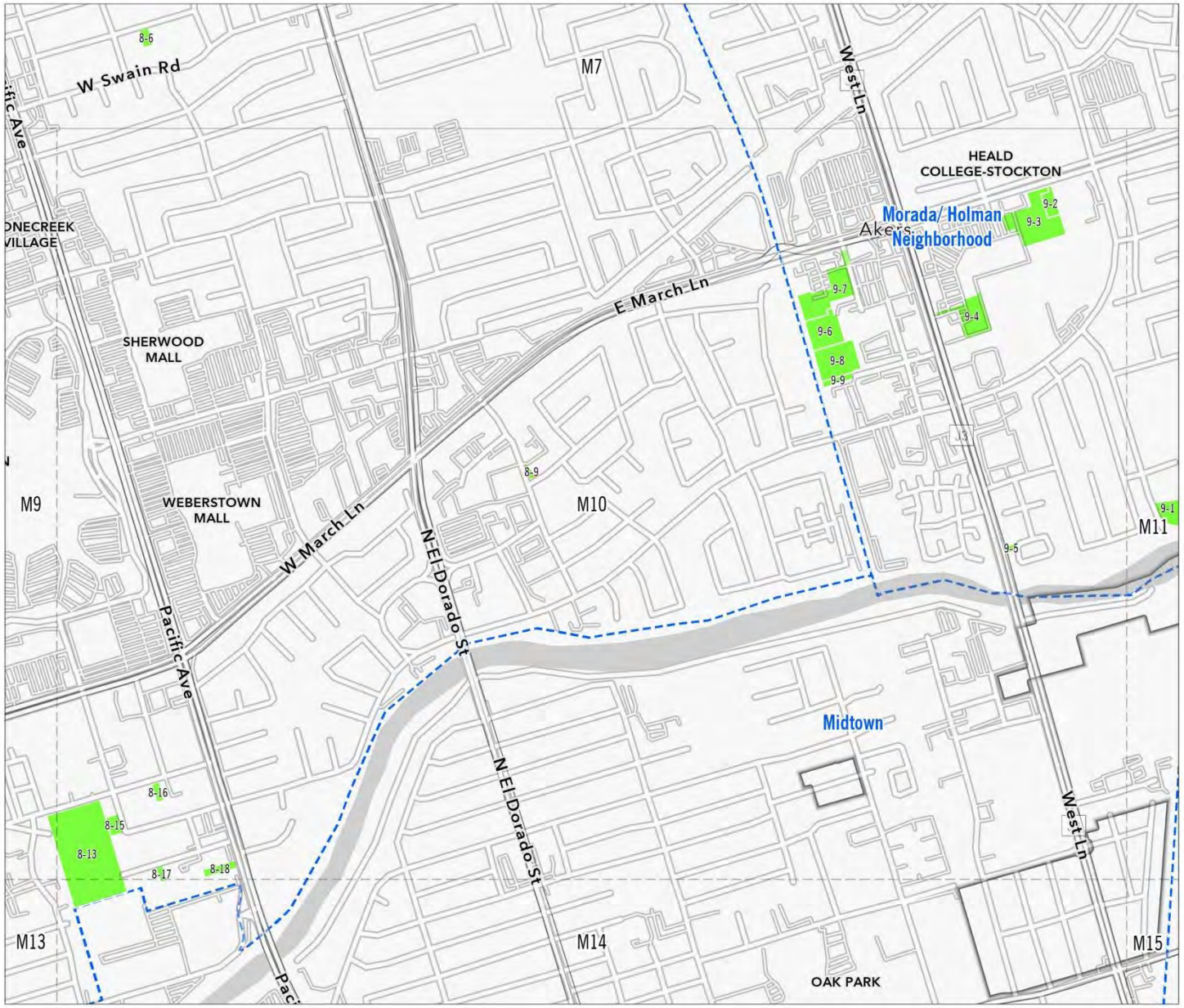
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
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Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

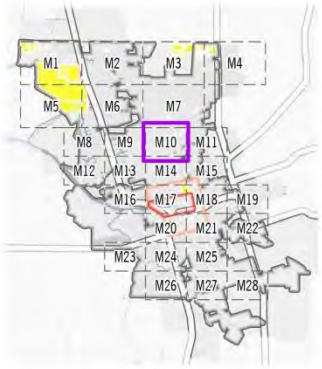
Revision Date: 11/20/2023

Sites Inventory Map M10



Stockton City Limits
Stockton Neighborhoods
Housing Site
Vacant Site

Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

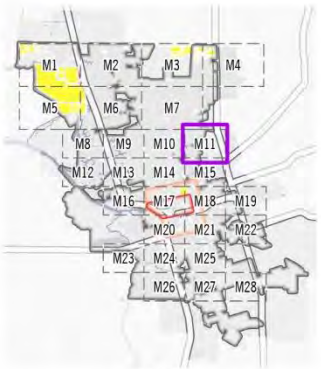
Revision Date: 11/20/2023

Sites Inventory Map M11



Stockton City Limits
Stockton Neighborhoods
Housing Site
Vacant Site

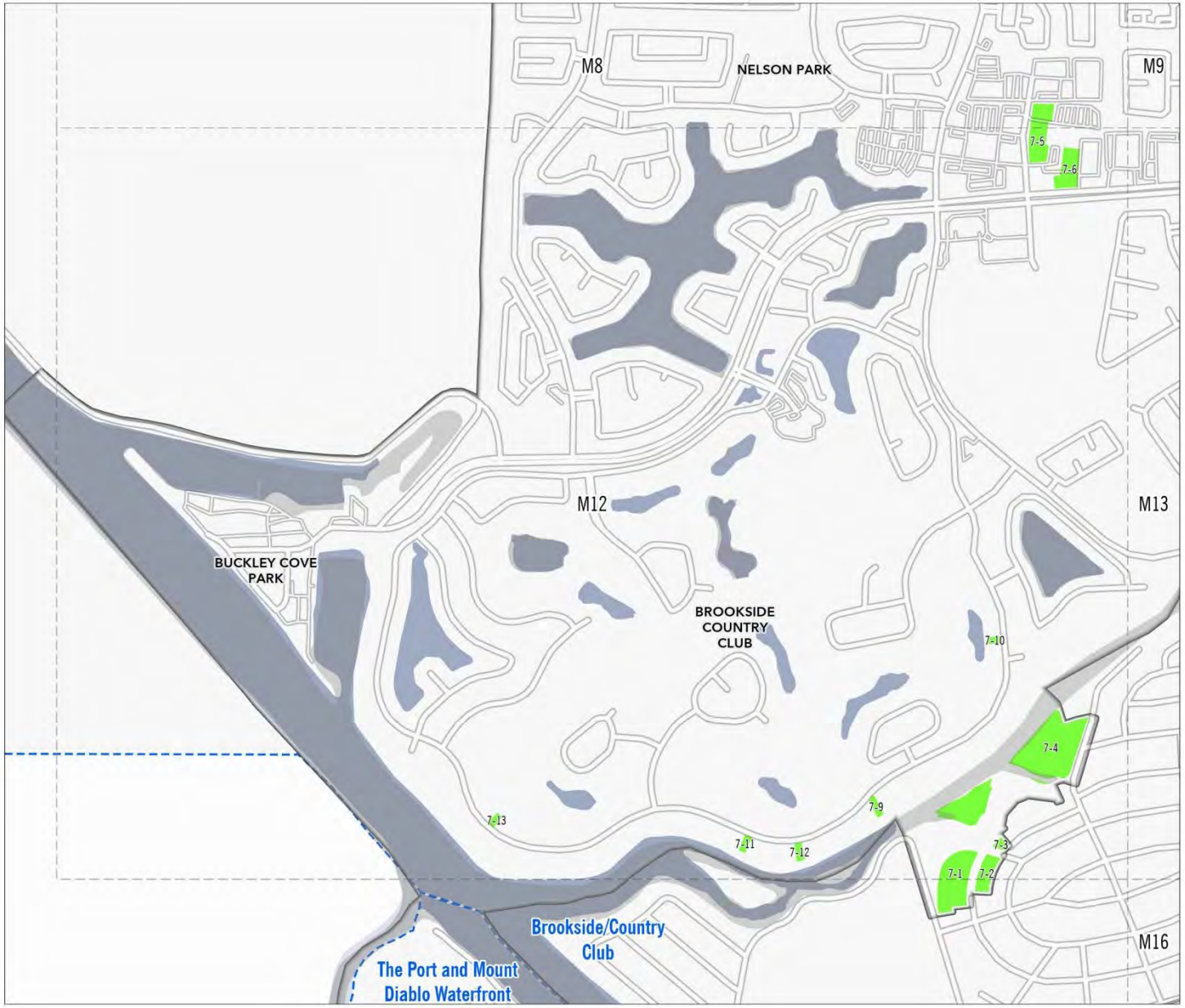
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

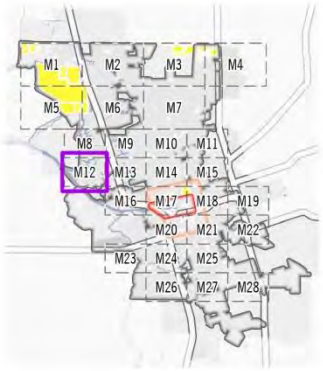
Revision Date: 11/20/2023

Sites Inventory Map M12



Stockton City Limits
Stockton Neighborhoods
Housing Site
Vacant Site

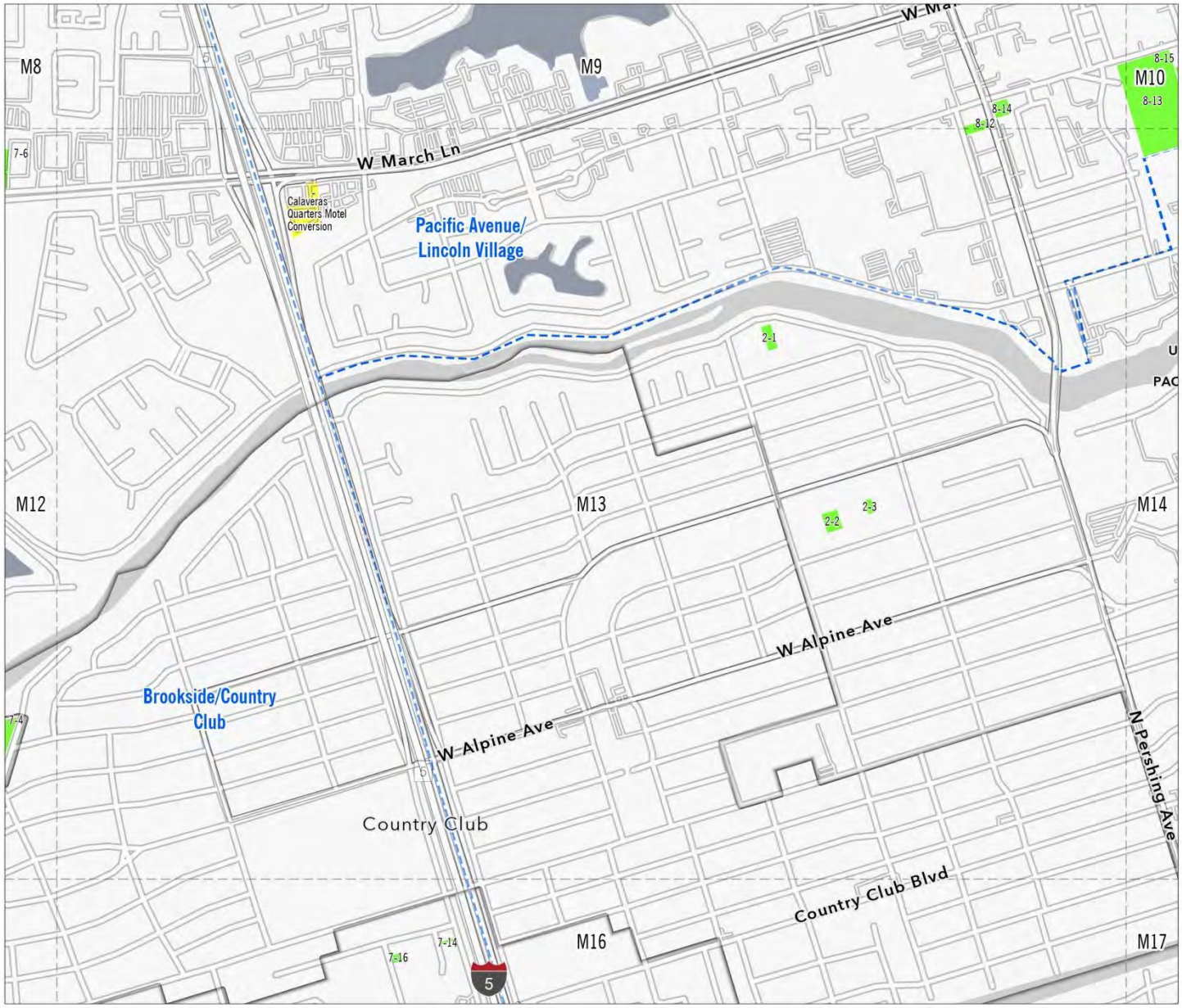
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

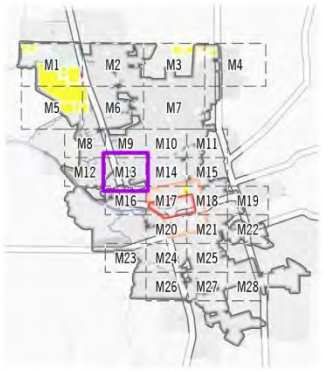
Revision Date: 11/20/2023

Sites Inventory Map M13



Stockton City Limits
Stockton Neighborhoods
Housing Site
Pipeline Project
Vacant Site

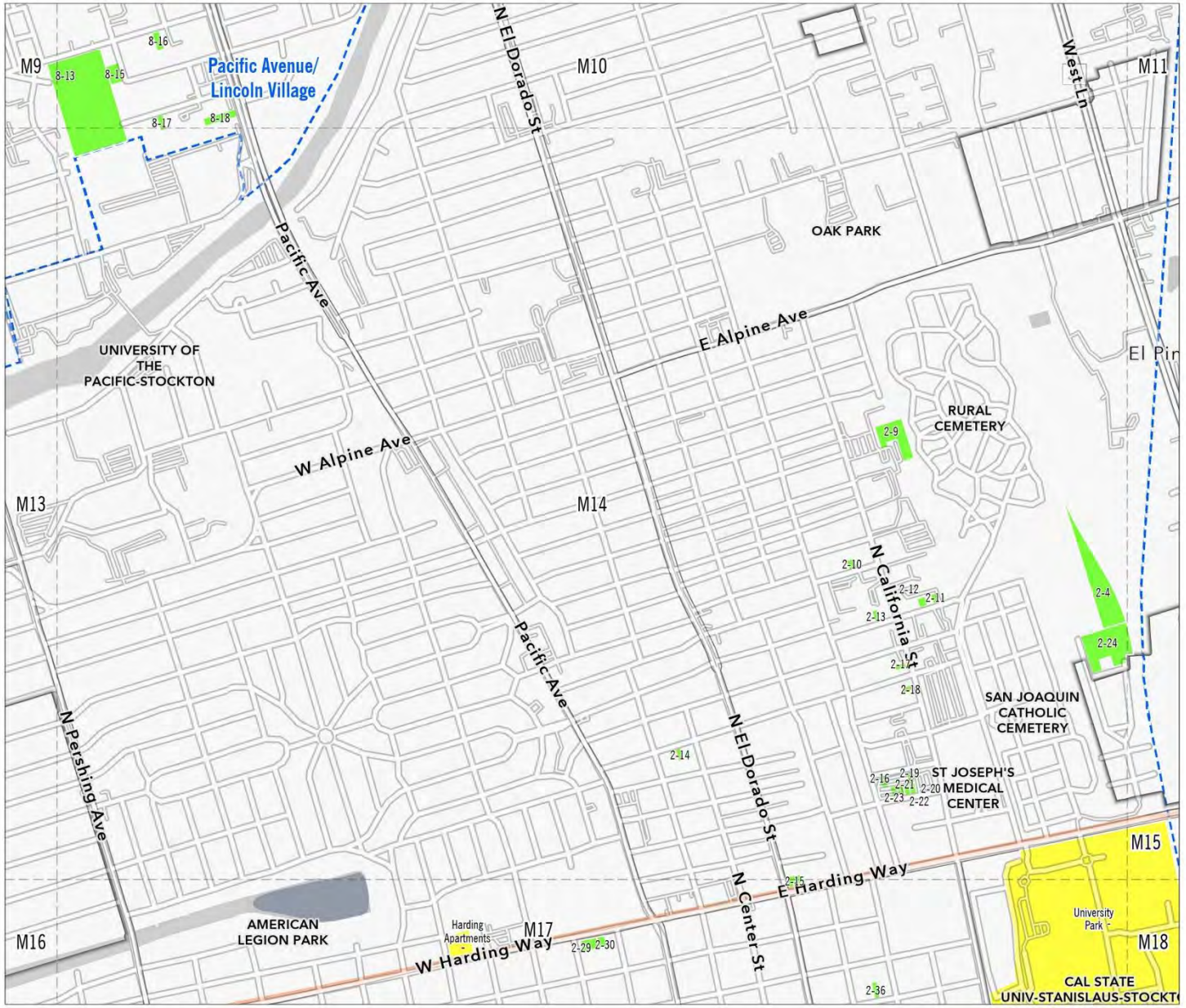
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

Revision Date: 11/20/2023

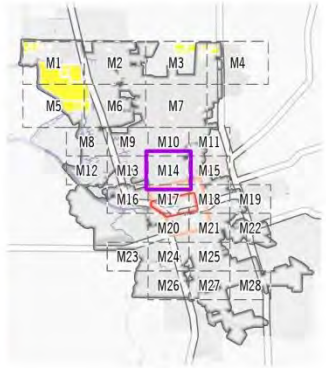
Sites Inventory Map M14



Stockton City Limits
Stockton Neighborhoods
Greater Downtown

Housing Site
Pipeline Project
Vacant Site

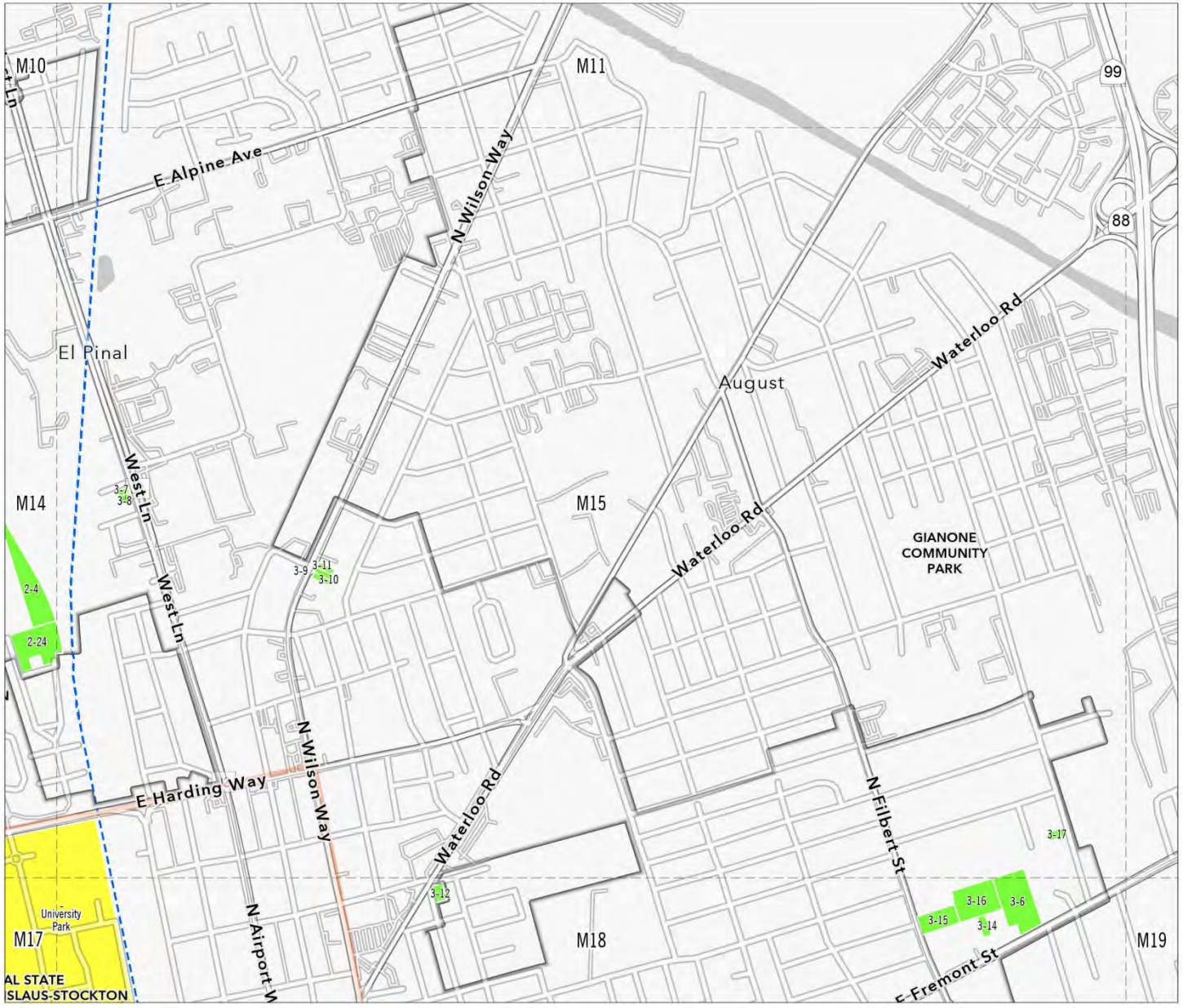
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

Revision Date: 11/20/2023

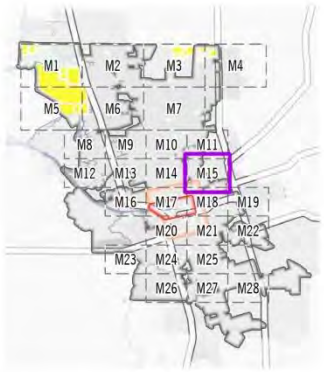
Sites Inventory Map M15



Stockton City Limits
Stockton Neighborhoods
Greater Downtown

Housing Site
Pipeline Project
Vacant Site

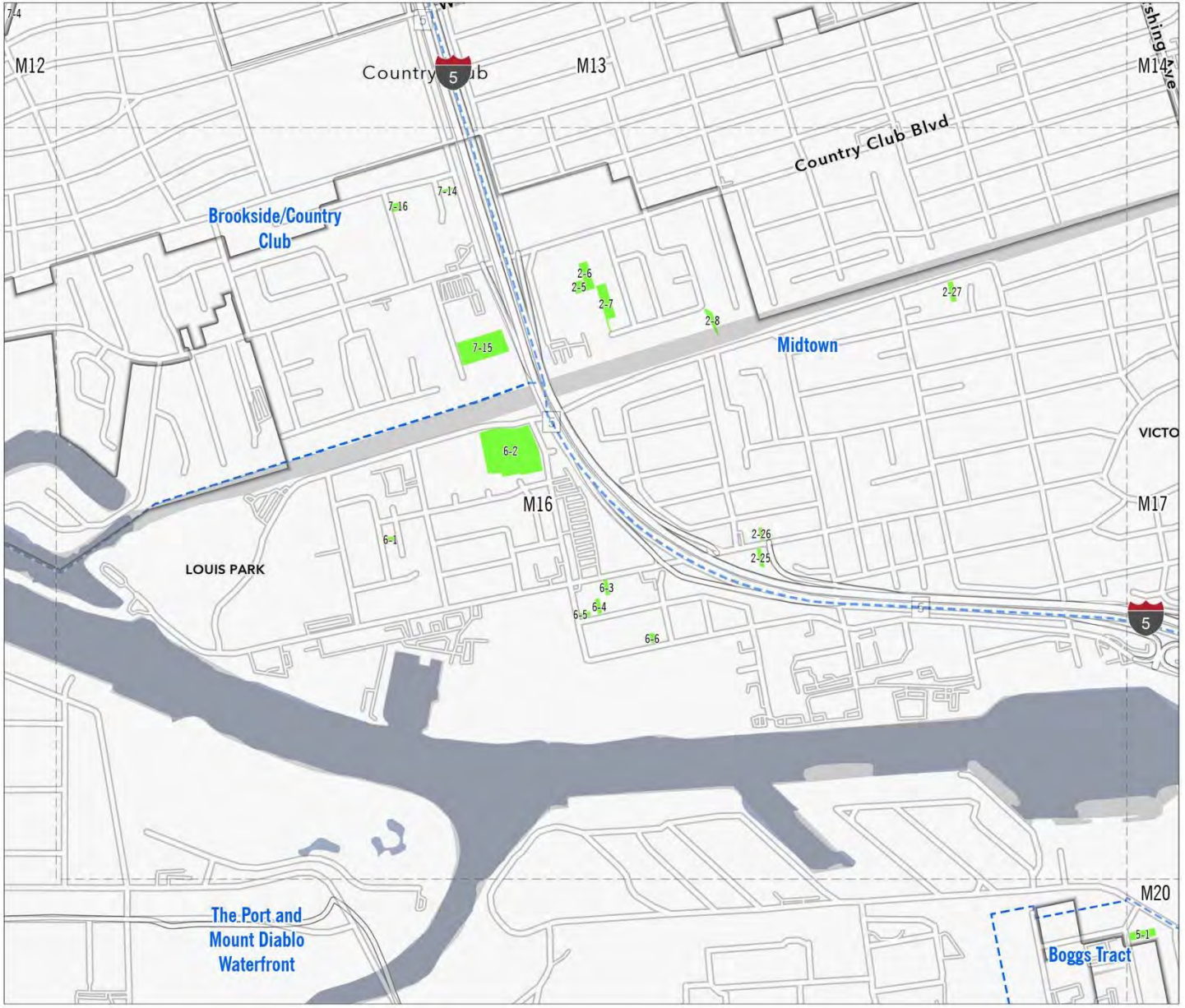
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

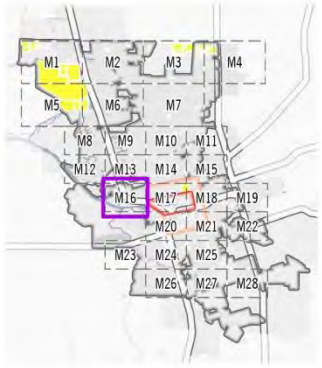
Revision Date: 11/20/2023

Sites Inventory Map M16



Stockton City Limits
Stockton Neighborhoods
Housing Site
Vacant Site

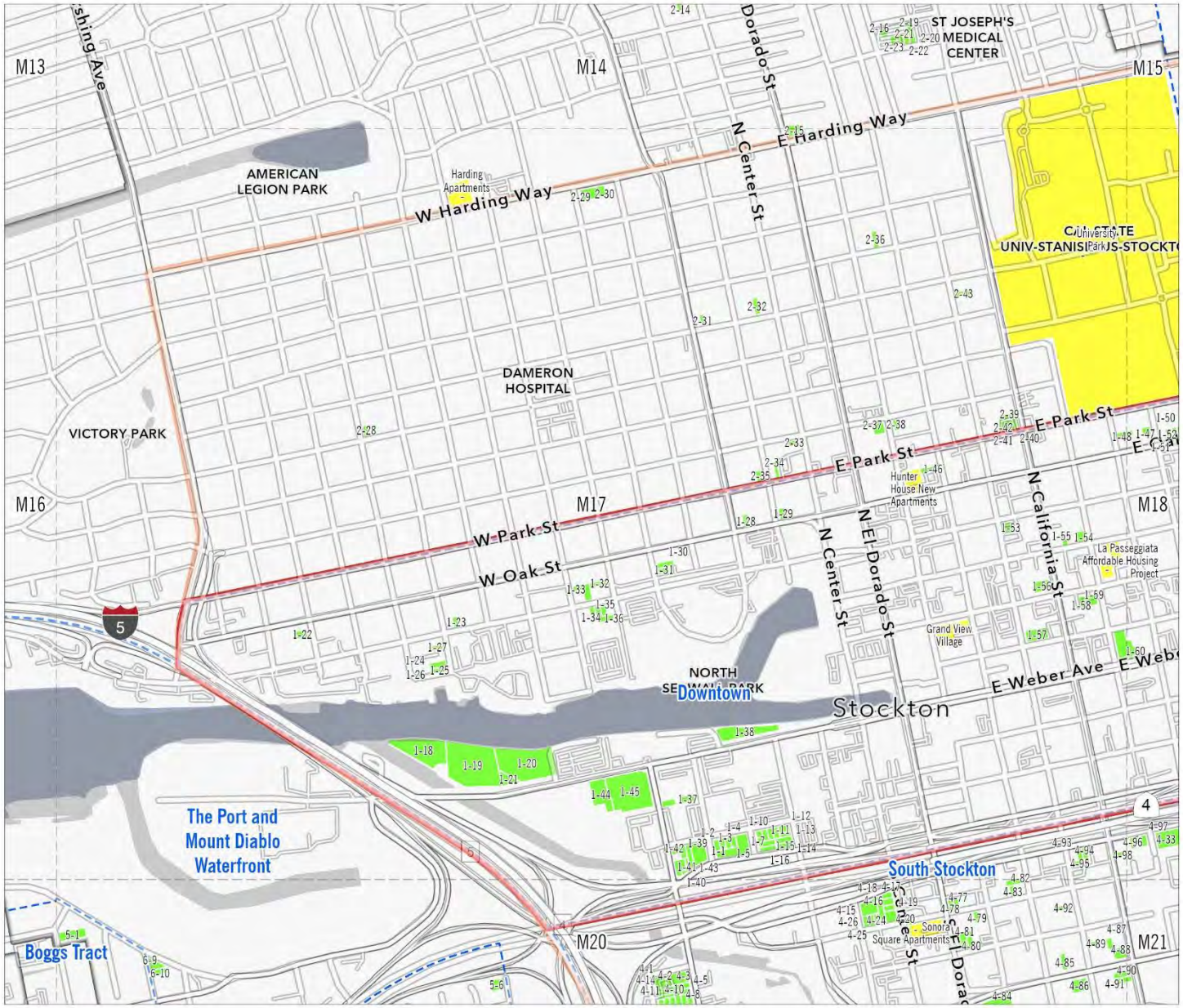
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

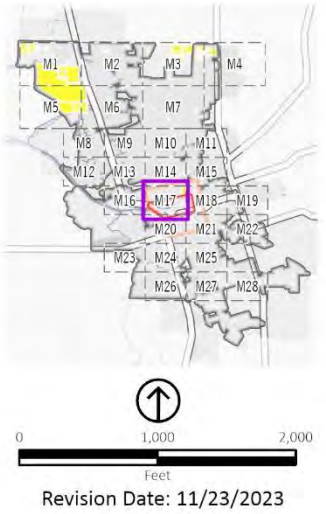
Revision Date: 11/20/2023

Sites Inventory Map M17





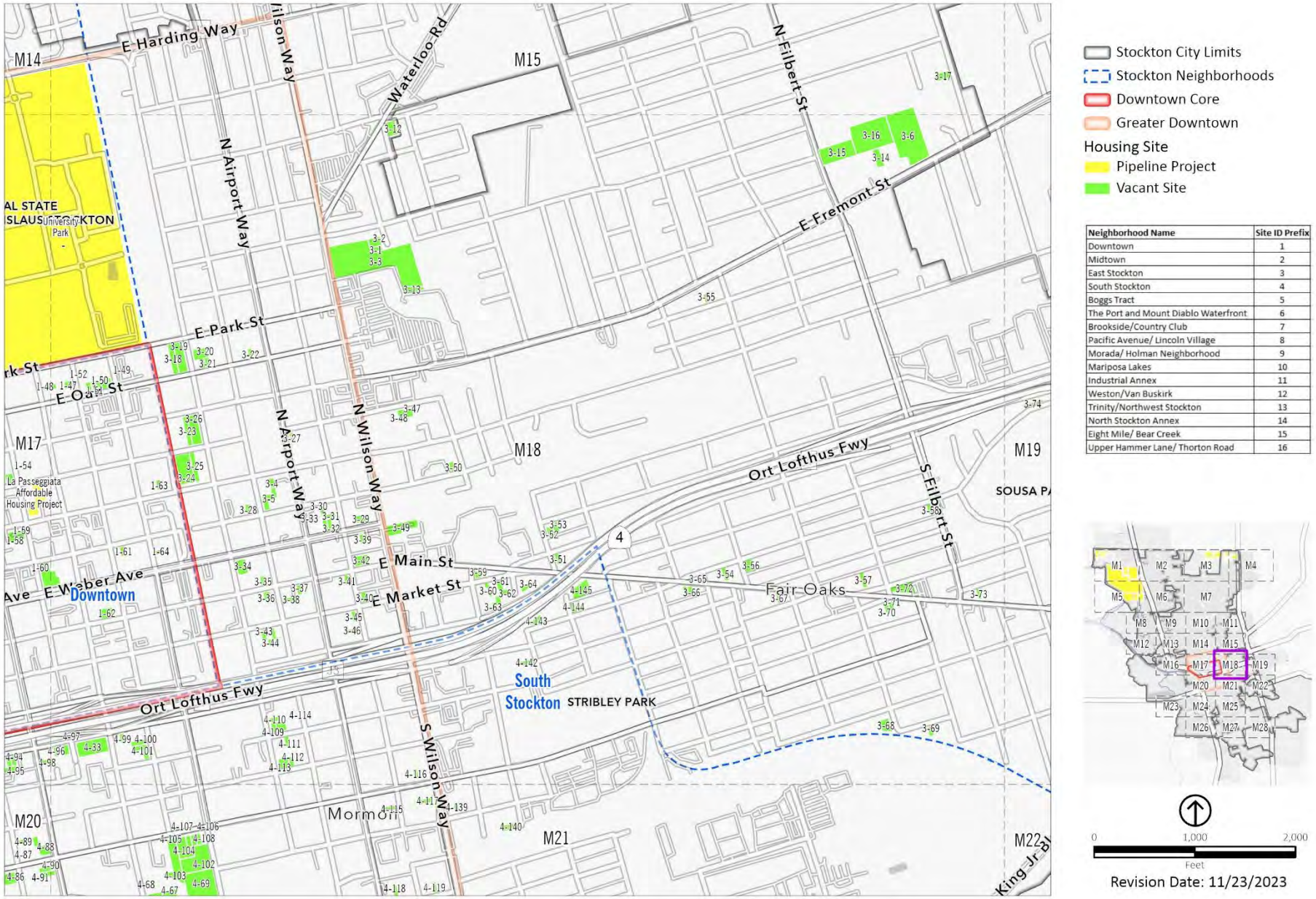
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



Revision Date: 11/23/2023

No units are counted towards the RHNA on sites 3-1 through 3-3, 4-1 through 4-14 and 4-27 through 4-30

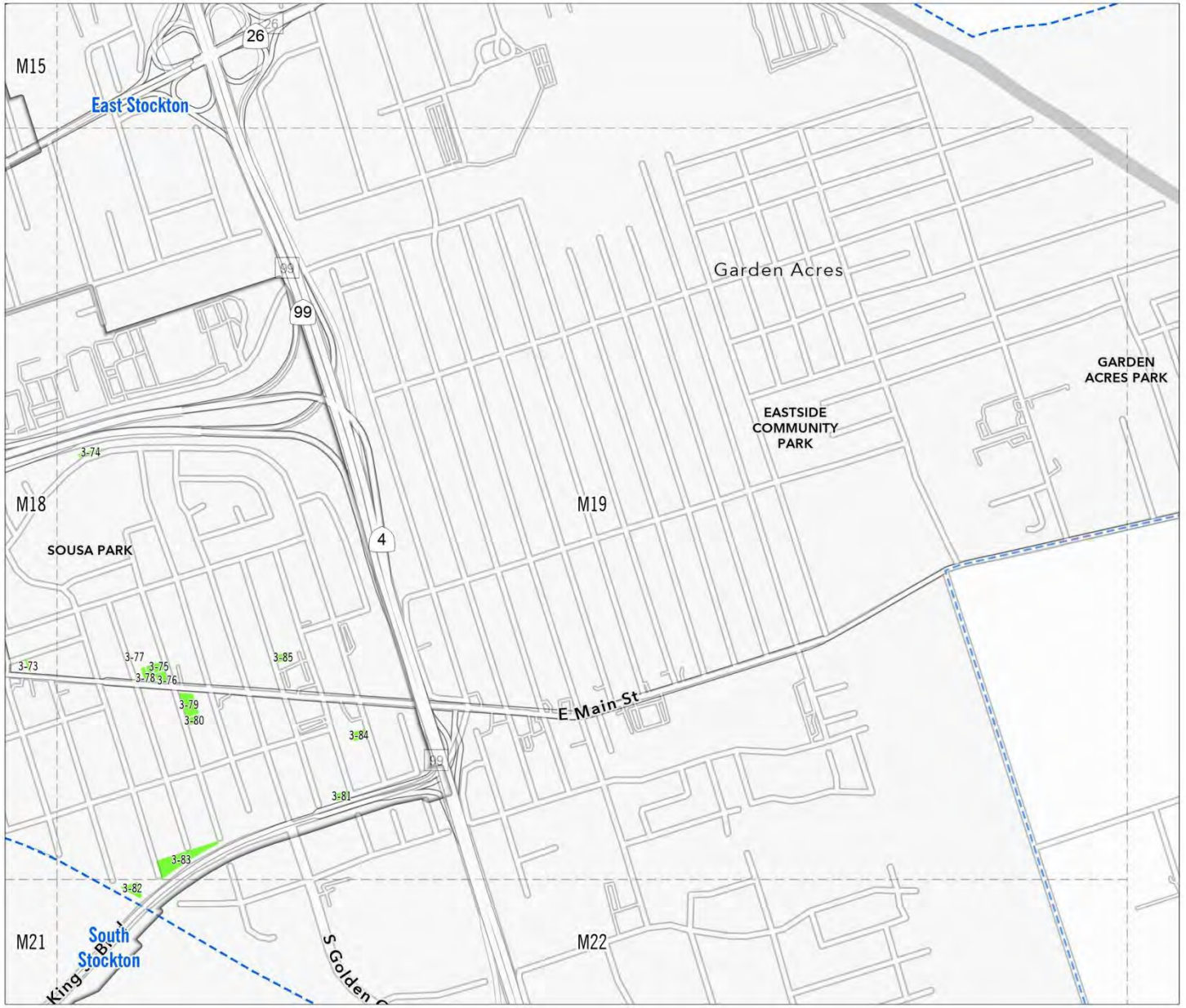
Sites Inventory Map M18



Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16

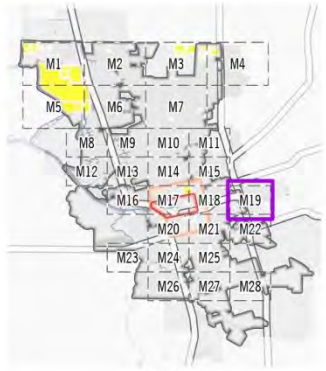
No units are counted towards the RHNA on sites 3-1 through 3-3, 4-1 through 4-14 and 4-27 through 4-30

Sites Inventory Map M19



Stockton City Limits
Stockton Neighborhoods
Housing Site
Vacant Site

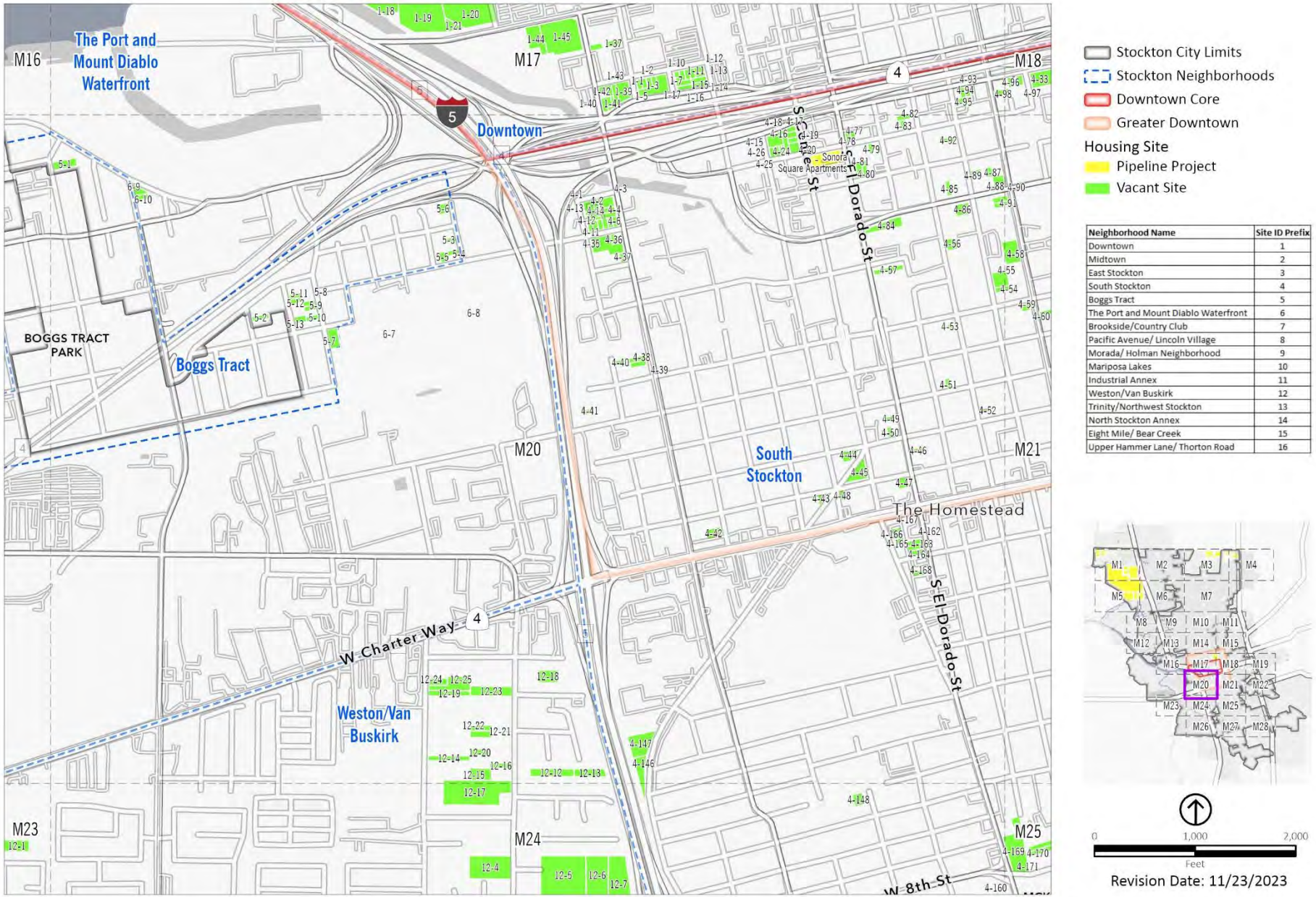
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

Revision Date: 11/20/2023

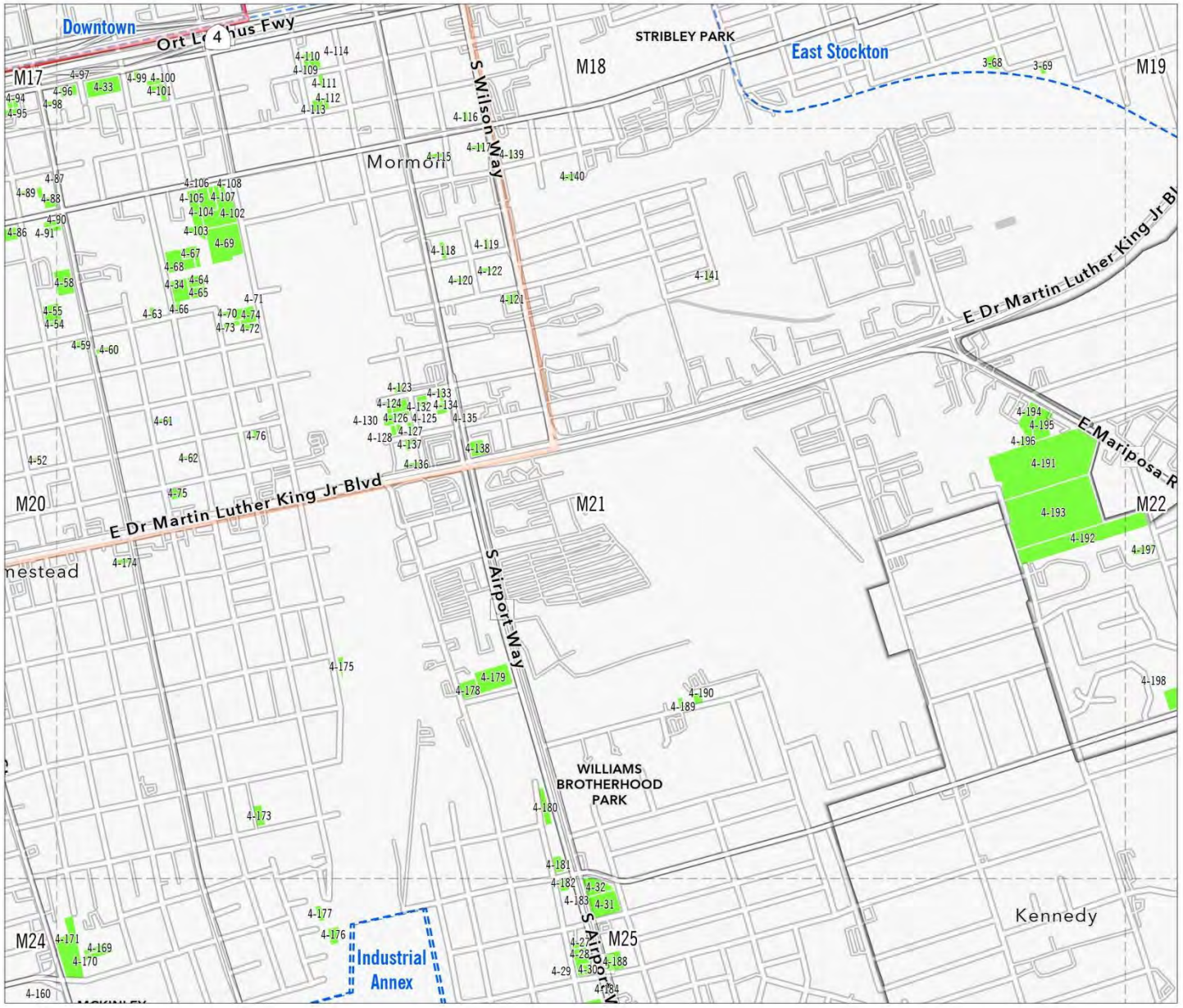
Sites Inventory Map M20



Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16

No units are counted towards the RHNA on sites 3-1 through 3-3, 4-1 through 4-14 and 4-27 through 4-30

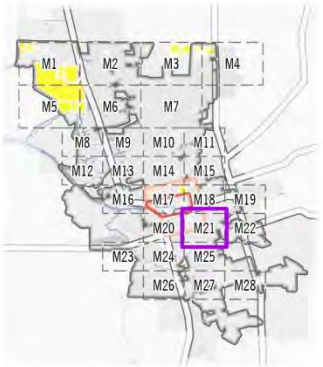
Sites Inventory Map M21



Stockton City Limits
Stockton Neighborhoods
Downtown Core
Greater Downtown

Housing Site
Vacant Site

Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

Revision Date: 11/20/2023

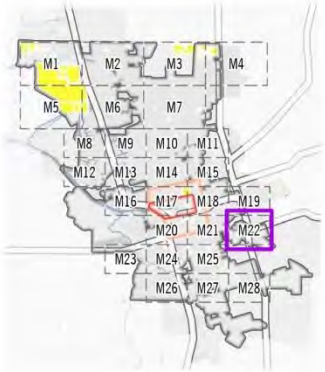
No units are counted towards the RHNA on sites 3-1 through 3-3, 4-1 through 4-14 and 4-27 through 4-30

Sites Inventory Map M22



Stockton City Limits
Stockton Neighborhoods
Housing Site
Vacant Site

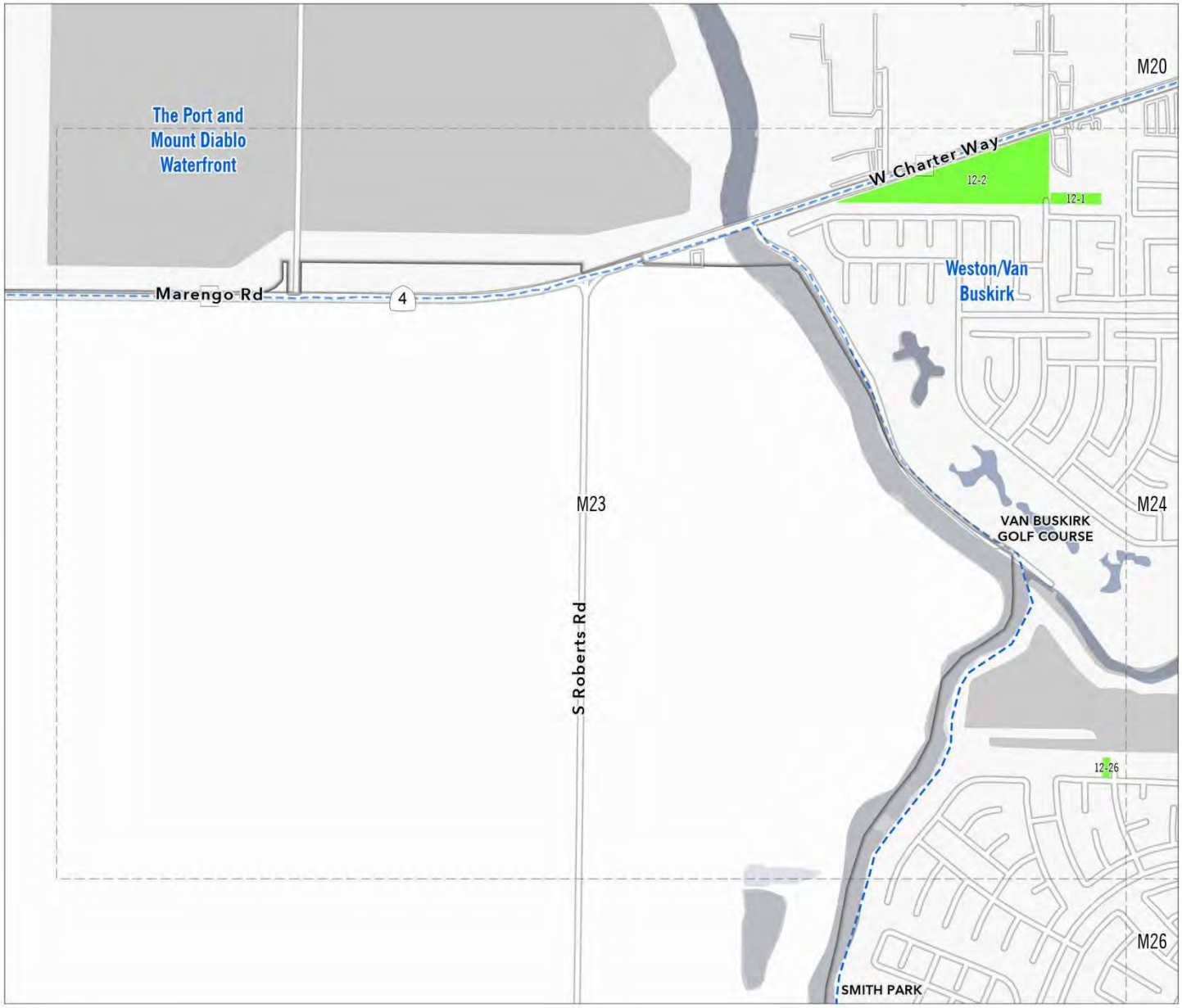
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

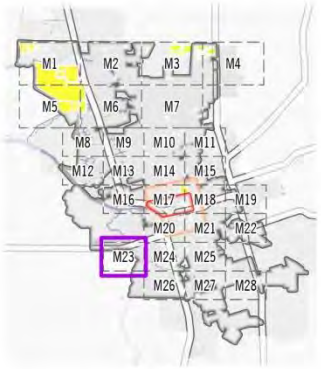
Revision Date: 11/20/2023

Sites Inventory Map M23



Stockton City Limits
Stockton Neighborhoods
Housing Site
Vacant Site

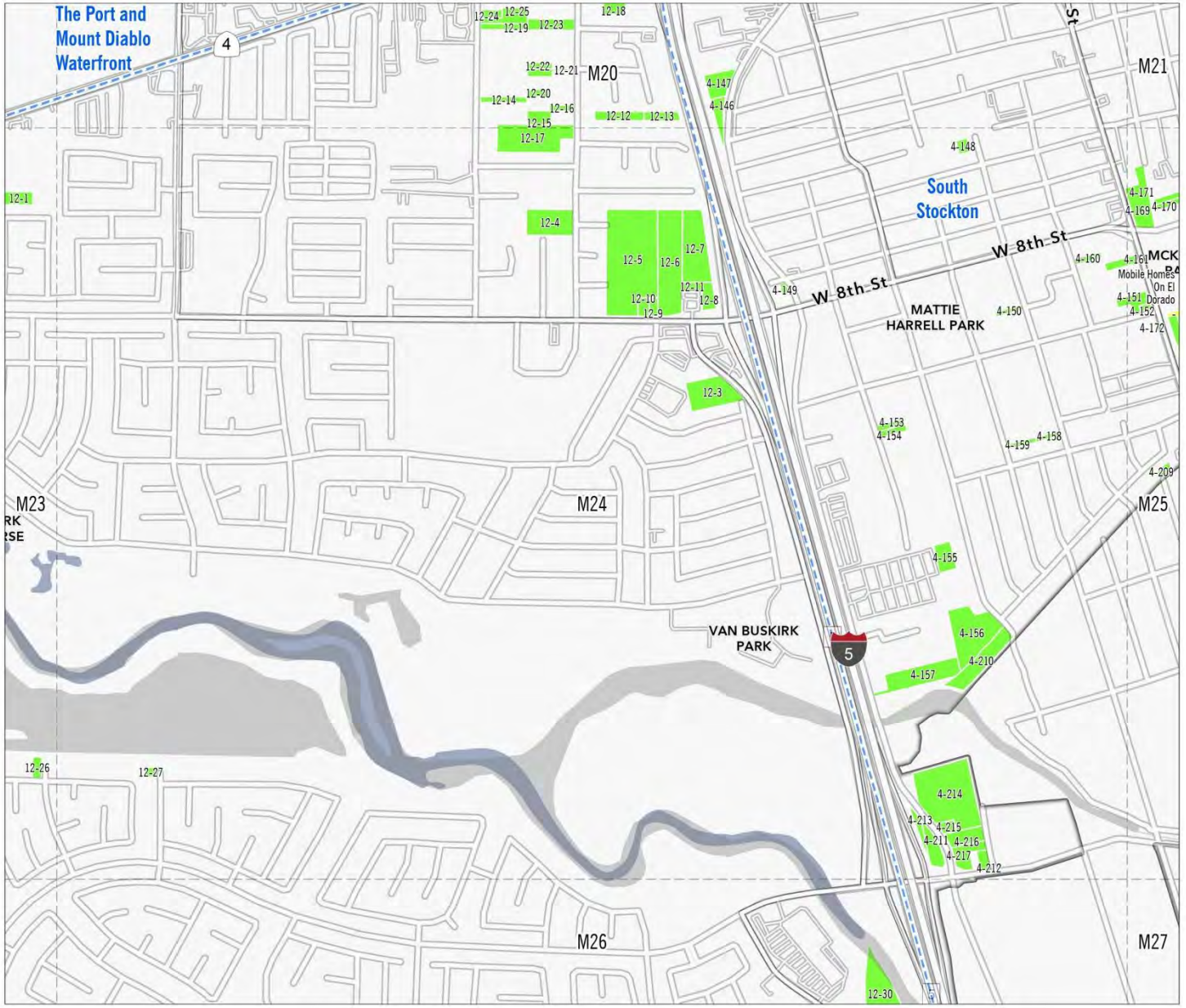
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

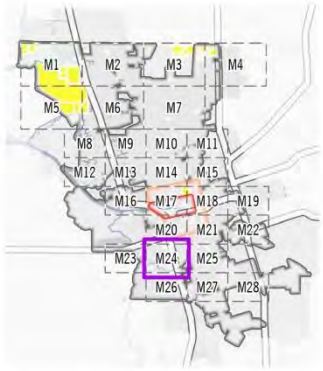
Revision Date: 11/20/2023

Sites Inventory Map M24



Stockton City Limits
Stockton Neighborhoods
Housing Site
Pipeline Project
Vacant Site

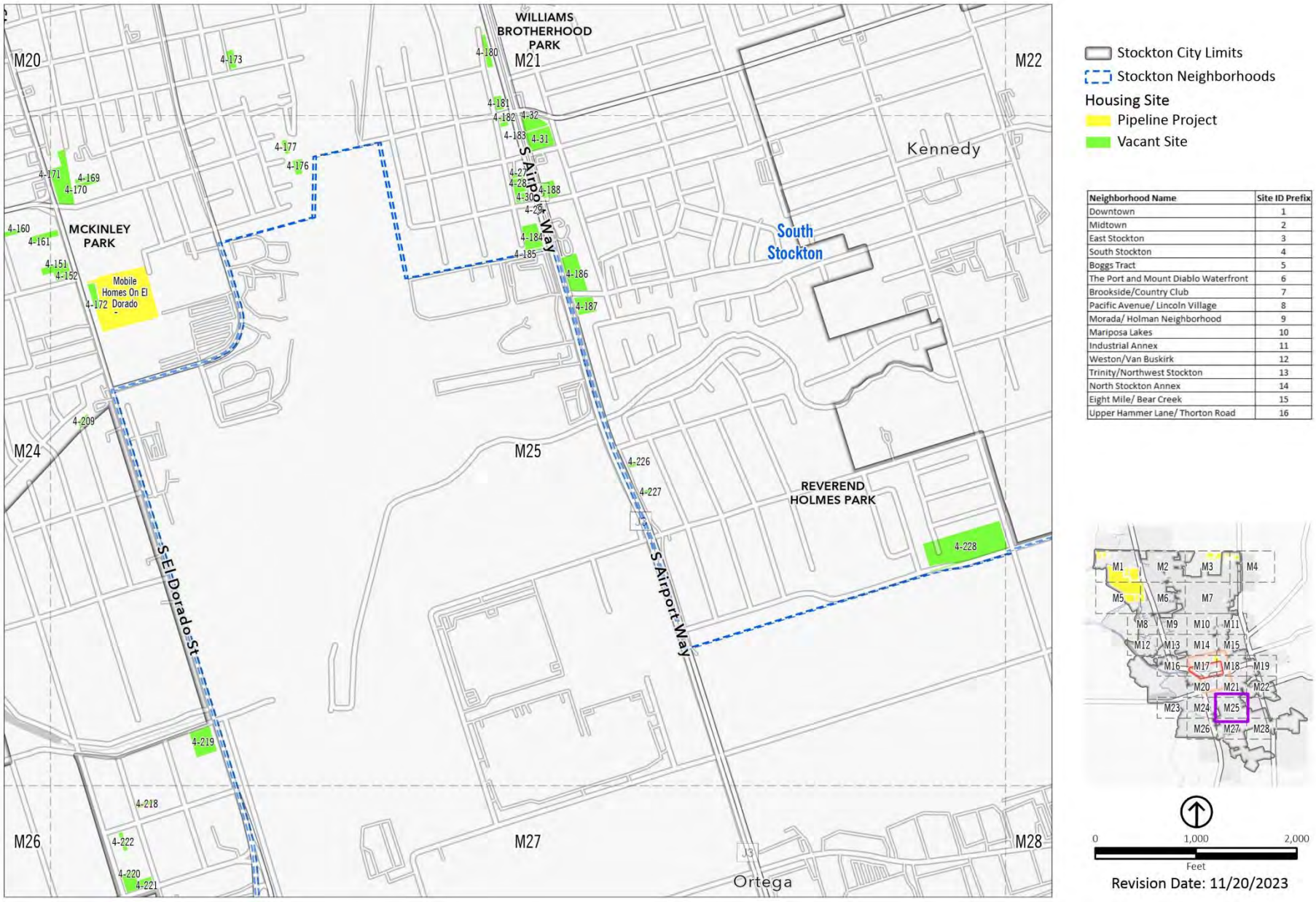
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

Revision Date: 11/20/2023

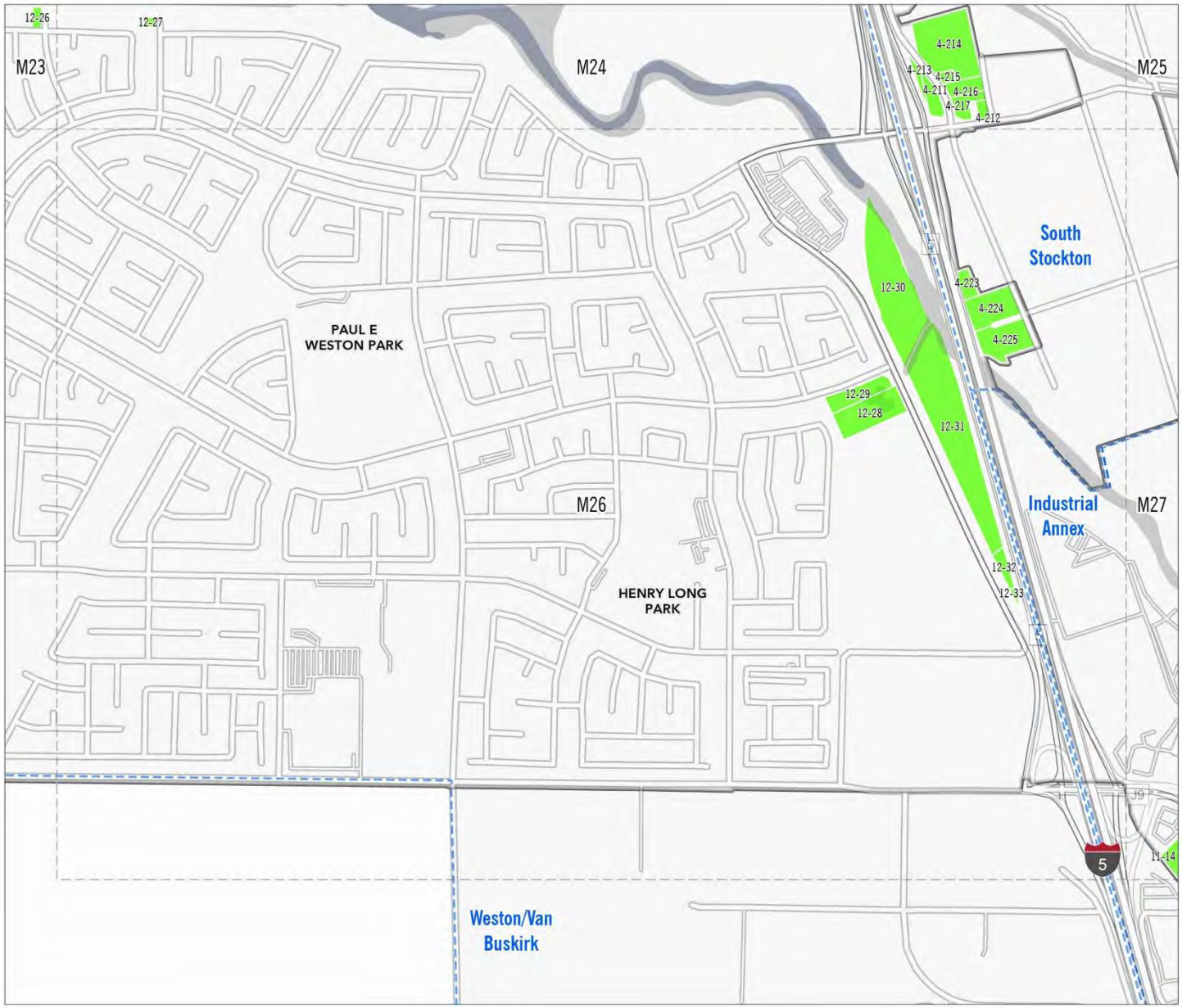
Sites Inventory Map M25



Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16

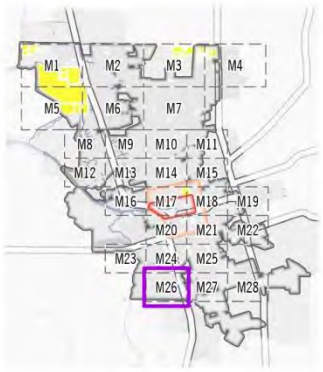
No units are counted towards the RHNA on sites 3-1 through 3-3, 4-1 through 4-14 and 4-27 through 4-30

Sites Inventory Map M26



Stockton City Limits
Stockton Neighborhoods
Housing Site
Vacant Site

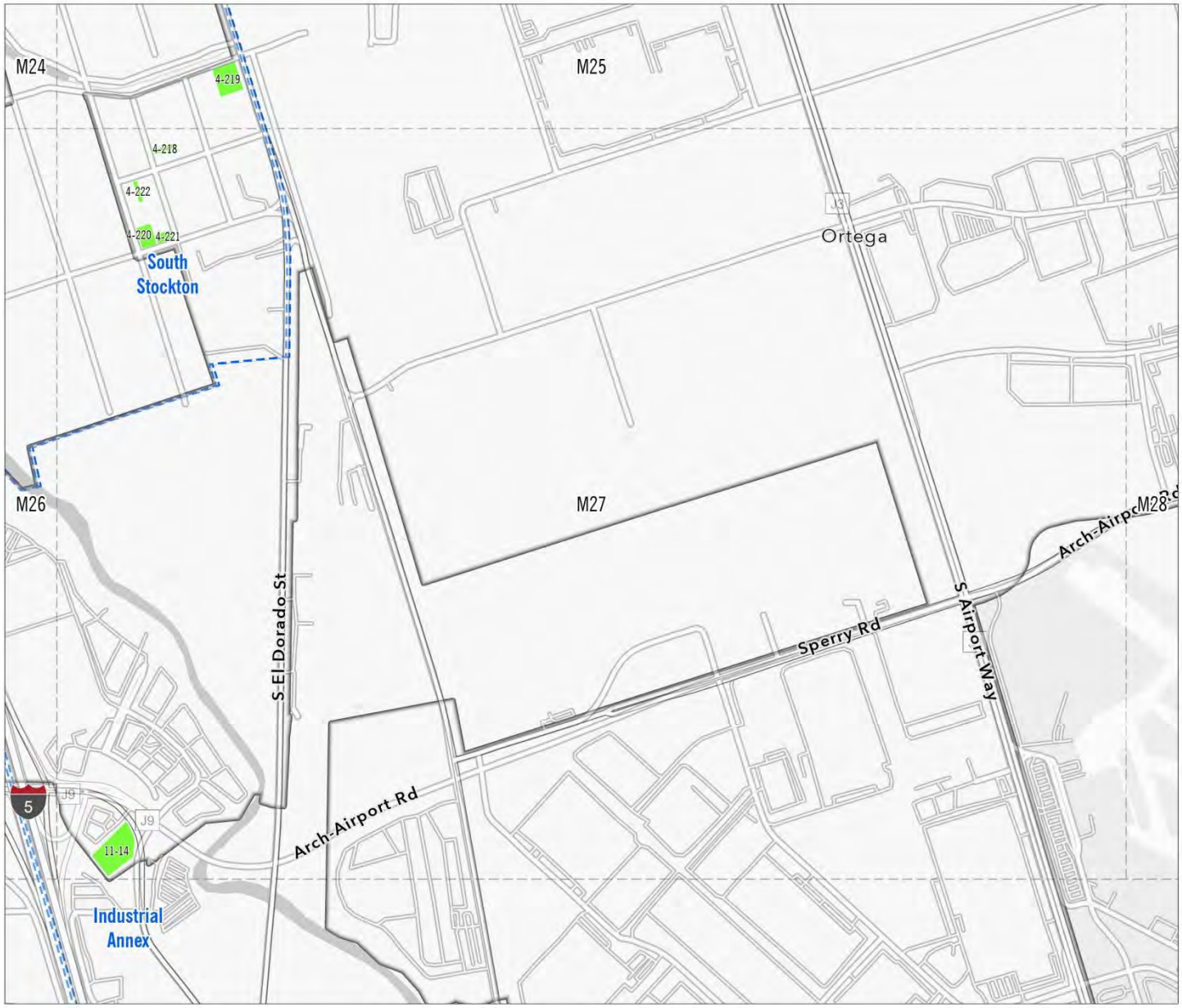
Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

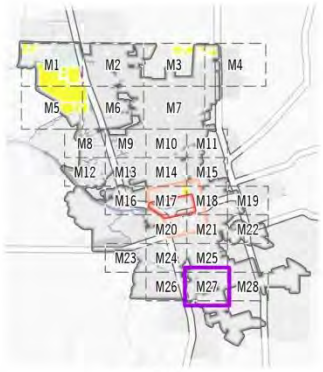
Revision Date: 11/20/2023

Sites Inventory Map M27



Stockton City Limits
Stockton Neighborhoods
Housing Site
Vacant Site

Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
Weston/Van Buskirk	12
Trinity/Northwest Stockton	13
North Stockton Annex	14
Eight Mile/ Bear Creek	15
Upper Hammer Lane/ Thorton Road	16



0 1,000 2,000
Feet

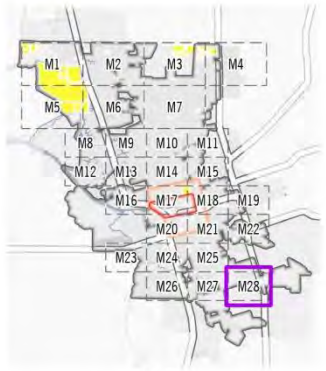
Revision Date: 11/20/2023

Sites Inventory Map M28



Stockton City Limits
Stockton Neighborhoods
Housing Site
Vacant Site

Neighborhood Name	Site ID Prefix
Downtown	1
Midtown	2
East Stockton	3
South Stockton	4
Boggs Tract	5
The Port and Mount Diablo Waterfront	6
Brookside/Country Club	7
Pacific Avenue/ Lincoln Village	8
Morada/ Holman Neighborhood	9
Mariposa Lakes	10
Industrial Annex	11
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Revision Date: 11/20/2023

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APPENDIX B: PUBLIC PARTICIPATION SUMMARY

B

RELEASE OF PUBLIC REVIEW DRAFT HOUSING ELEMENT

The Public Review Draft Housing Element was released for a 30-day public review of April 12, 2023. The City notified the public through an eblast and posted the draft on the City website.

Table B-1. Summary of Public Outreach

Outreach Event	*Type*
Housing Action Plan/Displacement Study Stakeholder Consultations (Spring to Summer 2022)	*Consultation interviews*
Sites Workshop (September 14, 2022)	*Workshop*
Housing Element/Housing Action Plan Workshop (October 19, 2022)	*Workshop*
Housing Element Service Provider Consultations (November 2022)	*Consultation interviews*
Housing Sites Workshop (February 28, 2023)	*Workshop*

HOUSING ELEMENT SERVICE PROVIDER CONSULTATIONS

In November 2022, seven consultations were conducted with Stockton stakeholders to offer opportunities for each of them to provide one-on-one input. Representatives from the following organizations were interviewed:

- The Housing Authority of San Joaquin County
- San Joaquin Fair Housing
- Valley Mountain Regional Center, San Joaquin County (Main Office)
- Disability Rights California
- Faith in the Valley
- Community Partnership for Families/The Community Foundation of San Joaquin

In each of the consultations, the stakeholders were asked some or all of the following questions, depending on the type of organization interviewed:

1. Opportunities and concerns: What are the three top opportunities you see for the future of housing in this jurisdiction? What are your three top concerns for the future of housing in this jurisdiction?
2. Housing Preferences: What housing types do your clients prefer? Is there adequate rental housing in the community? Are there opportunities for home ownership? Are there accessible rental units for seniors and persons with disabilities?
3. Housing barriers/needs: What are the biggest barriers to finding affordable, decent housing? What are the unmet housing needs in this jurisdiction?
4. Housing Conditions: How would you characterize the physical condition of housing in this jurisdiction? What opportunities do you see to improve housing in the future?
5. How has COVID affected the housing situation?

Stakeholders discussed opportunities and concerns for the future of housing in the city. Stakeholders described in detail seeing opportunity in increasing the variety of future developments, including mixed-use, infill development, accessory dwelling units, etc.; spreading out affordable housing rather than concentrating it; improving local housing data; expanding housing services and resources; updating the zoning code to be more inclusive and accessible; and continuous compliance with State law. At the same time, participating stakeholders shared similar concerns, including about the lack of existing affordable housing, homelessness, limited housing for formerly incarcerated individuals, and the amount of time it takes for developments to be processed and built. Throughout these consultations, stakeholders provided their perspectives on the housing preferences of Stockton residents. Most, if not all, described their clientele preferring, at the bare minimum, safe, habitable, accessible, stable, and affordable housing. Many stakeholders described the issue of the majority of Stockton renters being cost-burdened, meaning they spend more than 30 percent of their income on housing costs. Some stakeholders described the effect of many people in Stockton resorting to uninhabitable housing due to not being able to afford anything better. They shared that landlords do not feel the pressure to fix units knowing that their tenants are desperate for housing as housing costs continue to increase while housing supply is very limited. In addition, stakeholders reported that due to migrations from the Bay Area, landlords have evicted long-time tenants to make the unit available at higher, unreachable rental prices.

Throughout these consultations, stakeholders identified barriers to housing in Stockton, including limited housing supply, affordability, renter application requirements, fees and deposits, housing costs, the court system, historic racism and segregation, the criminalization of the unhoused population, and lack of political will from elected officials. The unmet housing needs in Stockton, according to these stakeholders, are that there isn't enough habitable and affordable housing in the city, especially for populations on a fixed income. Stakeholders specified that housing conditions varied depending on what part of the city you were in. It was shared that the southside faces more dilapidation issues, and the conditions are believed to be worse compared to the rest of the state. Many residents take what they can afford, and it has been reported that includes housing that is uninhabitable.

Stakeholders shared that the factors that limit equity and fair housing are rooted in systemic racism, capitalism, sexism, and ableism. To begin to address these equity and fair housing concerns, stakeholders believe that the City needs to incorporate programs that reflect the needs of those most vulnerable in the Stockton community. This can include programs that support affordable housing developments, an eviction protection and right to counsel program, developing a dedicated housing trust fund for affordable housing, landlord educational tools and resources, genuine advocacy for the homeless, a universal income program, a reasonable accommodation process, and social housing opportunities for people to co-own areas/property. They share that when placing new affordable housing developments, they should avoid being concentrated in a single area, and should be spread out equitably throughout the city. They also shared that the City should ensure all new developments have an inclusionary housing component, which can be done by adopting inclusionary housing policies and programs.

HOUSING ACTION PLAN/DISPLACEMENT STUDY STAKEHOLDER CONSULTATIONS

In support of efforts to prepare a Housing Action Plan for the City of Stockton, consultant team member BAE Urban Economics participated in a total of ten interviews with area stakeholders in the Spring and Summer of 2022 regarding issues and opportunities for the production and preservation of housing. Additional interviews will be conducted in the spring of 2023 with market rate developers to inform preparation of pro forma financial models for target housing types in Stockton. Due to significant overlap in the subject matter targeted for this initial round of interviews, and the list of stakeholders to be interviewed, BAE partnered with Enterprise Community Partners which was similarly engaged in preparation of an anti-displacement strategy for the City of Stockton. Participants in the first round of interviews included representatives from the following:

- Stocktonians Taking Action to Neutralize Drugs (STAND)
- Visionary Home Builders
- The Housing Authority of San Joaquin County
- Central Valley Low Income Housing (CVLIHC)
- Reinvent South Stockton Coalition (RSSC)
- Housing Justice Coalition (Part of the RSSC)
- National Association for the Advancement of Colored People (NAACP)
- Enterprise Community Partners
- Grupe Huber Company
- Little Manila Rising

While the topics covered during each interview varied slightly based on the expertise and affiliation of the interview participant, all of the interviews covered the following topic areas:

- Housing Needs and Preferences – What types of housing are your clients or constituents looking for? What types of housing are they most struggling to locate and secure? What are the barriers they are facing? Where do they typically end up?
- Housing Instability and Insecurity – What types of housing insecurity are being observed? What trends, factors, or characteristics are contributing to housing insecurity among your clients or in your community? What solutions are being used?
- Gaps in Housing Availability – What types of housing are being undersupplied in the Stockton Market? What types are being over supplied? Why?
- Barriers to Housing Production – What are the main barriers to housing production in Stockton? How does this vary by housing type (e.g., single-family homes, missing middle housing, multifamily apartments, tiny homes, etc.)? Do the barriers to housing production vary in different parts of the community?
- Barriers to Housing Preservation – What are the main barriers to the preservation of existing housing? What should the City be doing to facilitate housing preservation?
- Causes of Residential Displacement – What are the main observed drivers of residential displacement? How are your clients or constituents being impacted? How are different groups or populations impacted? How are different parts of the city being impacted and why?

Interview participants expressed a range of perspectives and experiences, but generally agreed on the underlying economic factors contributing to a lack of desired housing production in Stockton. All interview participants acknowledged an overabundance of detached single family housing in Stockton, which represents a majority of the newly built housing inventory. Interview participants acknowledged an under production, and lack of general availability, of higher density multifamily rental and missing middle housing, both rental and for-sale, that would meet the needs of their clients. Participants indicated that new construction is generally concentrated in the more affluent neighborhoods in north Stockton, and that there are large areas that are going unserved by new market-rate development, but which feature populations that would benefit from an expansion of the housing inventory, such as in south Stockton and the downtown area. These areas tend to be lower-income and residents often have less mobility, but which still offer robust neighborhood networks and cultural affiliations. The reasons cited for the lack of development in these areas include the high cost of construction and the

relatively limited purchasing power of lower-income households in these areas.

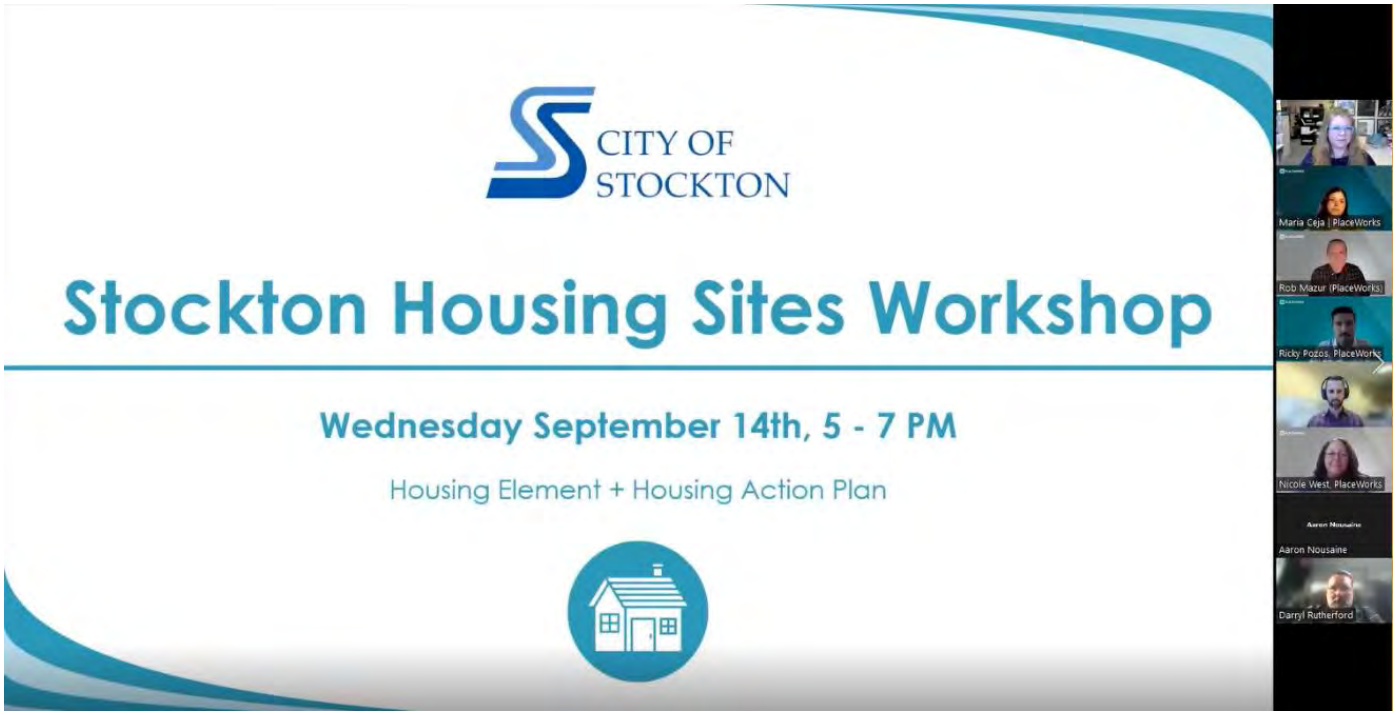
Interviews indicated that a lack of newly constructed housing is putting tenants under pressure to accept housing that is, at least in some cases, in substandard condition and often more expensive than is typically considered appropriate. Participants indicated a relatively high prevalence of multiple households banding together to afford housing, resulting in overcrowded conditions, as well as households paying well over the accepted 30 percent of their income towards housing. Due to a lack of alternative housing options, households are often reluctant to submit complaints about substandard conditions and are unable to secure housing at more affordable rates. This is particularly prevalent among renter households, though interview participants also noted problems among lower-income owner households who are having trouble maintaining their homes. This sometimes results in foreclosure or condemnation, but more often in the household selling the property, often at a suppressed value due to the condition of the property. Multiple interview participants noted that many of these houses are then being purchased by higher-income households. The impression is that they are coming from outside the area, and that they subsequently rehabilitate the property and benefit from immediate equity appreciation. Interview participants voiced concerns that this dynamic prevents lower-income homeowners from fully benefiting from potential equity appreciation. Participants recommended increased funding for code enforcement and an enhanced multifamily rental inspection program to identify habitability issues. Participants also recommended increasing funding for home rehabilitation assistance to help keep lower-income homeowners in their homes and to discourage displacement and gentrification.

Interviewees noted that housing instability and displacement in Stockton is really a function of high and increasing housing costs, both for new construction and existing units, and stagnation among local workforce wages and associated household incomes. The pandemic exacerbated these trends with many lower-wage and service sector workers either losing their jobs or taking significant unpaid leaves of absence due to business closures and work-from-home policies. Interview participants experienced a significant increase in the need for homelessness prevention and rapid rehousing services during the first two years of the pandemic, which is now beginning to abate with the revocation of pandemic-era restrictions. Interviewees commented that the City needs to pursue an aggressive expansion of the housing stock (something other than detached single-family homes) to address the lack of inventory, as well as strong economic development programs that can improve the earning potential of existing Stockton residents. Without both an increase in housing availability and the ability of households to pay for housing, the issue will continue to get worse and the number of households facing housing instability will grow.

To facilitate the production of low-income housing, as well as transitional and permanent supportive housing, interview participants indicate that the City needs to adjust expectations regarding funding recapture, allowing more grants and forgivable loans. Interviewees also suggested the City needs to increase its willingness to allow funding to go towards supportive services and that the City needs to consider programs to reopen existing single room occupancy (SRO) properties and/or facilitate development of new SRO properties in appropriate locations. They suggested the City also needs strong policies and programs to preserve naturally occurring affordable housing, where possible. Examples of these policies and programs may include, but should not be limited to, rehabilitation funding for both rental and ownership properties, possibly coupled with workforce housing deed restrictions (i.e., limited to occupancy by households with at least one person employed within the community), rental assistance and grants for back rent, cash incentives to property owners willing to accept tenants using public assistance, etc.

Interview participants generally supported efforts to expand the housing stock with a preference for the addition of both market rate and below-market rate rental housing. There is a desire to see such development both in higher income areas that can provide better access to opportunity for lower-income households, but also within lower opportunity areas where households are experiencing the greatest need. All interview participants also acknowledged that the City's aim should be to avoid adding additional low-income housing inventory in the downtown, as the city

is already at risk of creating conditions associated with concentrated poverty, which run counter to the long-term objectives of the community towards creating a commercially and culturally vibrant downtown environment for all Stockton residents. The challenge seems to be that that is where the infrastructure capacity is concentrated and where it may be possible to secure land zoned for high density housing at a relatively low cost (i.e. City owned). Also, the area is unlikely to experience market rate housing development in the near future, so it can often be attractive to try to leverage low-income housing to try and spur investment.



Residents participated in the workshop by Zoom.

Many stakeholders believe that the COVID-19 pandemic has unveiled serious housing issues, as well as simultaneously making them worse. Due to the pandemic, there were economic shutdowns and job losses that put many people at risk of homelessness or became homeless, increasing the homeless population. The pandemic increased the number of households needing resources and services; however, the distribution of these resources are not equitable. Stakeholders shared that during the pandemic, prisons released large amounts of formerly incarcerated individuals who needed housing and were at risk or became homeless. They saw a rise in domestic violence cases, and due to Project HomeKey, all hotels in the surrounding area were booked, leaving agencies unable to place domestic violence survivors in a safe space. During COVID, the pressures of Bay Area migration to Stockton were exacerbated, including rising rents due to limited supply. The eviction moratorium provided safety for economically impacted renters but impacted landlords through a lack of resources. Overall, COVID has negatively impacted housing in Stockton.

PUBLIC WORKSHOPS

Throughout the Housing Element process, the City Staff has conducted workshops to guide its development.

SITES WORKSHOP, SEPTEMBER 14, 2022

The first community workshop for Stockton residents as part of the Housing Element update took place via Zoom on Wednesday, September 14, 2022, from 5:00 pm to 7:00 pm. The purpose of this workshop was to educate residents about the update process, solicit input on potential housing sites to be included in the draft

Housing Element and priority sites to include in the Housing Action Plan, and hear resident insights and ideas on how the City can improve housing opportunities in the future. Spanish translation was available during the workshop.

City staff and consultants facilitated the workshop and 20 residents and interested persons attended and participated. Throughout the presentation about the Housing Element update process and the selection criteria for potential housing sites, community members were asked to provide feedback through interactive polling and invited to ask questions or provide comments in the chat. All questions and comments were read aloud, and either City staff or the consultants answered the question or documented receipt of the comment. The following are top questions and comments that were fielded by staff during the meeting.

- Participants asked about and requested ADU resources, such as grants and preapproved ADU plans.
- Participant asked about Public-private collaboration with nonprofit for affordable housing development
- Participant asked about Affirmatively Furthering Fair Housing (AFFH) implementation
- Participant asked if the City evaluates Missed Housing Development Opportunities
- Participant commented that housing should not be placed in areas with existing Issues in areas where sites are located, such as food deserts and being environmental justice issues

During this workshop, attendees were asked to participate in a series of polls and select their preferred responses. The following poll questions were asked:

1. Which housing groups do you think Stockton needs to focus on and provide housing for? (Select up to three)
2. What type of housing is needed in Stockton?
3. To decide which sites are priorities for housing development, what criteria is most important to you?

The first poll question's results reflect the respondents' selection of who they believe the City needs to provide housing for. The top three populations are homeless or recent homeless individuals, low-income households, and persons with disabilities. For the second polling question, the majority of respondents believe that the type of housing Stockton needs is mixed-use and rental apartments. For the final polling question, respondents believed that access to grocery stores, restaurants, and shopping, as well as including affordable housing are the most important criteria.

There were a set of discussion questions presented to residents during this virtual meeting. The following questions were asked of attendees:

1. What neighborhoods or street corridors in Stockton should be developed with new housing?
2. Why isn't housing being built in Stockton?
3. What's preventing the types of housing you'd like to see from being built?

These comments have been considered and incorporated into the Housing Element, as applicable. The community workshop was recorded and posted on the City's Housing Element webpage.

HOUSING ELEMENT/HOUSING ACTION PLAN WORKSHOP, OCTOBER 19, 2022

The second community workshop, as part of the Housing Element update and Housing Action Plan preparation process, took place in person at the Buskirk Community Center on Wednesday, October 29, 2022, from 5:00 pm to 7:00 pm. The purpose of this workshop was to educate residents about the Housing Element update and Housing Action Plan processes and an opportunity for attendees to share their ideas and ask related questions. Spanish translation was available during the workshop, and translation for additional languages was available upon request.

City staff and consultants facilitated the workshop and 20 residents and interested persons attended and participated. Throughout the presentation about the Housing Element update and Housing Action Plan process and the selection criteria for potential housing sites, community members were asked to provide feedback through interactive polling and invited to ask questions or provide comments in the chat. All questions and comments were read aloud, and either City staff or the consultants answered the question or documented receipt of the comment. The following is a paraphrased

list of the top questions and comments that were fielded by staff during the meeting.

- Participant requested Migration data of people moving to Stockton from the Bay Area.
- Participant asked more information about New state housing laws, including laws that allow housing in commercial zones.
- Participant asked for further explanation about information about evictions.
- Participant emphasized the importance to evaluate fair housing issues before deciding where new housing should go/where to build.
- Participant asked about the type of input the City wanted at this workshop. They wanted to know the distinction between wanting to know about housing types and what amenities should be included.
- Participant asked if there is data in the plan about how much of the housing stock is renter or owner-occupied. They also asked about how many residential units in the city are owned by non-resident property owners/investors?
- Participant stated that the draft RHNA sites on the online web map have many lower income sites in the downtown and shared their concerns because it is a polluted area that has very high CalEnviroScreen scores.
- Participants shared homelessness concerns, including local groups reporting 5,000 homeless persons, HCD considering homeless sweeps as a fair housing issue, and stopping the implementation of the no camping ordinance that would go into effect October 2022.
- Participant stated 80 percent of Stockton residents are cost burdened.
- A Disability Rights CA representative offered a fair housing training to the City (for decision makers or staff). Another person noted that the Planning Commission and City Council need to be educated on AFFH.
- Participant requested updating the presentation and housing tools board to make more sense to the lay person.
- Participant asked about the City webpage where they cover what the Community Development Department doesn't do.
- Staff noted that the City allows up to four units by right (already in zoning, not just since Senate Bill 9 went into effect) in all residential zones. This means density can increase in most areas of the city, not just downtown.

There were a set of discussion questions presented to residents during this virtual meeting. The following questions were asked of attendees:

1. What do you think are the most critical housing issues in your community?
2. What do you think are the housing types most needed in the community?
3. When assessing new housing development that might be built in the next 8 to 10 years, what should be the community's most important consideration?
4. Is there anything else that you can share regarding additional housing opportunities in the community?
5. Any suggestions for soliciting additional Housing Element feedback?

These comments have been considered and incorporated into the Housing Element, as applicable.

HOUSING SITES WORKSHOP, FEBRUARY 28, 2023

The third community workshop occurred on February 28, 2023, at the Cesar Chavez Central Library, from 5:00 pm to 7:00 pm. The purpose of this workshop was to engage the community and share information about the draft Housing Element and Housing Action Plan sites. The purpose was also to receive the community's input regarding the prospective sites and share their insights on the best sites to catalyze housing development.

City Staff and consultants facilitated the meeting with 16 residents and interested persons, as well as one council member who attended and participated. The presentation focused on the Housing Element update's sites inventory and the Housing Action Plan's priority sites. After the presentation, a questions and answers session invited attendees to ask questions and provide their input. The following is a paraphrased list of top questions and comments that were fielded by staff during the meeting.

- Participant asked what a pipeline project is?
- Participant asked what happens if the City does not meet its RHNA requirements?

- Participant asked why specific letters were only sent to owners and did not consider renters?
- Participant asked for an explanation about the methodology utilized to categorize units per income level?
- Participant commented that the Master planned communities need more amenities other than roadways.
- Participants asked about developer and development related issues, such as why it can take a long time to complete, city and developer communication, and developer stagnancy.
- Participant asked if there are Housing Element programs that address issues for vulnerable populations, such as homelessness and tenant protection programs?
- Participant asked about the relationship between the different City efforts (the Housing Element Update, Housing Action Plan, and Zoning Consistency project).
- Participant commented that there are multiple lower income sites concentrated in R/ECAP areas and areas with high CalEnviroScreen scores.
- Participant asked if these sites are shovel ready and/or SB-9 approved?
- Participant asked if the Housing Action Plan will address the affordability gap in pipeline projects?
- Participant asked how breakdown of sites to meet the RHNA will be determined?
- Participant asked if the City gives bonds to help construction costs?
- Participant asked how the Housing Action Plan useful if it is not legally binding?
- Participant asked if the priority sites are all of the RHNA sites?
- Participant asked if the City is going to make CEQA streamlining recommendations to the State?
- Participant commented that the City does not do anything to help low-income communities on the outskirts of its jurisdiction.

HOUSING ELEMENT WORKSHOP, APRIL 10, 2023

A community workshop occurred on April 10, 2023, at the Cesar Chavez Central Library, from 5:00 pm to 7:00 pm. The purpose of this workshop was to engage the community and share information about the public draft Housing Element. The purpose was also to receive the community's input regarding the draft of the Housing element including the fair housing findings, sites inventory, and drafted programs.

City Staff and consultants facilitated the meeting with 11 residents and interested persons. Spanish interpreters were present at the meeting. The presentation focused on the Housing Element update's drafted sites inventory and programs. After the presentation, a questions and answers session invited attendees to ask questions and provide their input. The following is a paraphrased list of top questions and comments that were fielded by staff during the meeting.

- Participant asked if there are sub-categories within lower income RHNA?
- Participant asked when next meeting on the Housing Action Plan is and if there will be a draft available?
- Participant asked if there are penalties for noncompliance both in terms of Housing Element certification and achieving RHNA during the planning period?
- Participant asked if there are mixed income sites/projects that could happen?
- Participant asked how sites are assigned to RHNA categories and default density?
- Participant commented that some identified sites have constraints and that is why they haven't developed yet. For example, title issues, infrastructure issues, environmental constraints.
- Participant commented that the City process has improved in terms of working with applicants and saying yes to projects.
- Participant asked for the deadline to submit public comments.
- Participant asked if the City is required to build housing? They also asked if the RHNA number is for eight years?

- Participant asked if the RHNA numbers are not built, do they 'roll over' to the next Housing Element?
- Participant asked if there was any canvassing done? If yes, does staff had information on where those people live?
- Participant asked who owned the land identified for housing in the sites inventory?
- Participant asked how the City is streamlining affordable housing permit processes?
- Participant asked if affordability levels can be split up more?
- Participant asked what happens if the Housing Element is not in compliance?
- Participant asked if the City has policies in place to support mixed income development?
- Participant asked if the City can support conversion of vacant lots in South Stockton?
- Participant commented that the City does not do anything to help low-income communities on the outskirts of its jurisdiction.

STOCKTON HOUSING JUSTICE COALITION HOUSING ELEMENT WORKSHOP, MAY 3, 2023

On May 3, 2023 the Stockton Housing Justice Coalition held a public community meeting to discuss the Draft 6th Cycle Housing Element. The following housing barriers and desired policies and programs were identified by participants:

Issue/Barriers

- Lack of housing for low-income residents + emergency placements
- Creating housing in vacant properties
- Housing for people with disabilities
  - On SSI
  - Even with benefits, still unaffordable need to have a universal definition of what low-income is and what is affordable
- Keeping people in their homes tenant protections
- Low-income people of color only able to live in polluted + undesirable places
- Acceptance of housing vouchers discrimination
- Transitional housing for formerly incarcerated
- Housing stock quality
- Tenant resources navigation
- Criminalization of unhoused residents
- A lot of vacant buildings in downtown
- Tenant bill of rights, including Right to Counsel
- Environmental (racial, social) justice housing near polluted sites
- Concentrating poverty new units all together, without amenities

Desired policies and programs

- New tenant protection policies
  - Funding legal aid
- Preservation programs for existing market housing
- Community land trusts
- Vacant building tax
- Enforcement against discrimination
- Public education on rights + processes (radio, classrooms)
- Navigation for unhoused
- HDAP at CA DSS → housing while applying for SSI
  - Needs to be bigger
- Extending "Just Cause" to single-family
- Universal Income for renters
- Mitigation requirements for siting in industrial + highway areas
- Eviction diversion program
- Inclusionary requirements for specific groups domestic violence victims
- Sidewalks
- Audit of existing programs
- More mixed income sitting choice
- City should buy more land everywhere for future development
- Partnering with school districts for teacher housing
- Rent control/lower + enforcement rent cap
- Help for people + remove barriers on rental applications
  - Credit
  - Domestic violence victims
  - Exceptions or minimums
- Mitigate landlord concerns cleanup funds, etc.
- More landlord tenant/mediation
- Require provisions of written lease
- Rental registry
- Grants for ramps
- Subsidies for ADUs streamlining

PLANNING COMMISSION AND CITY COUNCIL MEETINGS

PLANNING COMMISSION, APRIL 27, 2023

The Planning Commission held a study session on the Draft Housing Element on April 27, 2023, that began at 5:30pm. The purpose of this study session was to receive direction on draft Goals, Policies, and Programs before submittal to the state for their initial review and to receive any missing housing topics that should be explored in the Housing Element.

City Staff and consultants facilitated the meeting with the Planning Commission. The public was also invited to attend. The presentation focused on the outreach efforts, Housing Element Fair Housing findings, incorporated community feedback and new, continued/modified programs. After the presentation, a discussion was opened, the following is a paraphrased list of notes from Planning Commissioners that are divided into topics:

The following were questions asked by Planning Commissioners:

- Planning Commissioner asked if there are specific concerns regarding the length of approval for housing?
- Planning Commissioner commented that the word inclusionary is thrown around a lot, in regards to housing, and asked what inclusionary means or how is it defined?
- Planning Commissioner expressed concerns about displacement and gentrification from out of area buyers.
- Planning Commissioner commented about barriers associated with rental applications.
- Planning Commissioner commented about the condition of rental housing.
- Planning Commissioner recommended for eviction protections.
- Planning Commissioner commented about the housing needs of special need groups.
- Planning Commissioner expressed concern regarding the higher rate of overpayment among renters
- Planning Commissioner asked what are governmental constraints?
- Planning Commissioner asked if the proposed ordinance consider protections for potential overpayments from the city for public utility use in particular water and electricity?
- Planning Commissioner asked if City was to provide that feedback before May 12th from the public how would we get that information?
- Planning Commissioner asked how long until the Housing Element comes back again?

The following were questions asked by the public:

- Participant commented that they would like to see very low-income housing addressed in the Housing Element.
- Participant commented that they want a more defined plan to identify and prevent homelessness and help people move out of homelessness.
- Participant asked what an e-blast is?

WRITTEN PUBLIC COMMENTS

Written public comments are included in Appendix C.

RESPONSE TO INPUT RECEIVED

City's response to written public comments is included in Appendix C in a cover letter and annotated attachments to the cover letter.

APPENDIX C: PUBLIC COMMENTS AND RESPONSE

C

CITY OF STOCKTON

COMMUNITY DEVELOPMENT DEPARTMENT
Permit Center • 345 N. El Dorado Street • Stockton, CA 952027 • (209) 937-8444 • Fax (209) 937-8893
www.stocktonca.gov

June 6, 2023

To all Interested Parties

Re: Public Review of the Draft 2023-2031 Housing Element

The City recently concluded its Public Review of the 6th Cycle Draft 2023-2031 Housing Element, which received three comment letters. The City staff would like to express their gratitude to all those who provided feedback and participated in various meetings related to Housing and Zoning. These workshops were instrumental in preparing the Draft Housing Element.

This letter formally responds to mutual themes expressed in the three comment letters received and corresponds to specific items in the Annotated Comment letters contained in Attachments A through C.

Revisions to the Draft Housing Element

Based on residents, stakeholders, and City staff comments, the Draft Housing Element has been revised to reflect the following summarized changes. These changes are categorized by topic and can be seen in track change form in the revised Policy Chapter in Attachment D.

- **Housing Protections**: Policies and programs have been revised to indicate the City's commitment to exploring various requirements and incentives for housing protections.
- **Housing Capacity and Affirmatively Furthering Fair Housing (AFFH) Site Analysis**: As Housing Capacity sites (a.k.a. RHNA sites) are oriented toward housing production while the other targets explicitly housing for certain groups, the City will continue to seek direction from the State on how these analyses should be implemented together. While a few housing capacity sites have been removed, staff was careful not to impact the overall housing capacity surplus as it could restrict the development options for the remaining housing sites. Furthermore, the Housing Action Plan will explore additional housing capacity options not listed in the Housing Element or required by state housing law. Those sites could include county land within the sphere of influence, underutilized infill lots, underutilized buildings within the downtown area, and potential redevelopment areas.
- **Development Code Overhaul**: Policies and Programs have been revised to highlight potential zoning code revisions to increase housing production for all incomes and groups. These revisions include the following:
    - allowing housing in more zoning designations,
    - provide more housing options,

  - adding new processes for increasing development densities,
  - additional infill allowances,
  - new zoning overlays to provide specific standards for particular neighborhoods, and
  - performance standards for new development to reduce potential impacts.
- **Housing Action Plan (HAP):** While the draft HAP has not been released, City staff is still seeking feedback from potential document users (residents, housing advocates, developers) on what should be in the document. The HAP will build from the Housing Element programs and explore additional strategies and recommendations to implement housing goals further. Areas of research include, but are not limited to:
  - development process summary for all types of housing (emergency, transitional, permanent),
  - proformas to explore funding options to reduce the cost gap in new housing construction,
  - infill development toolkit
  - list of funding and partnerships in the area for each housing need,
  - case studies on projects and redevelopment areas, and
  - detailed recommendations for specific topics and projects covered in the HAP.
- **Additional Outreach:** Between Fall 2022 and Spring 2023, City staff sent thousands of mailed notices to owners, dozens of notices to the Record and email group, hosted over fifteen Shape Stockton workshops, conducted dozens of interviews with stakeholders and held numerous meetings with residents and stakeholders. City staff will work with local and regional partners to explore additional opportunities for feedback before hearings for adoptions begin. These opportunities could include but are not limited to, the following:
  - Conduct follow-up interviews with all stakeholders contacted and interviewed.
  - Provide bilingual notices to local community organizations (schools, event centers, religious facilities, etc.) and attend meetings and gatherings where appropriate.
  - Continue to attend “Go-to-them-Events” when time allows. Past events are listed on the Shape Stockton website at Community Participation - City of Stockton (stocktongov.com).
  - Additional notifications in English and Spanish within local magazines and informational flyers.
  - Coordinate with Community groups and representatives to explore additional contacts and neighborhoods to reach out to.
  - Translate additional workshop materials into Spanish.
  - Create videos in English and Spanish summarizing all housing efforts with information on how to get involved.

A summary of all comments received for the Shape Stockton effort can be viewed on the Shape Stockton website at Shape Stockton - City of Stockton (stocktongov.com). Shape Stockton consists of grant-funded efforts that include updates to the City’s Development Code and Design Guidelines, required Housing Element Update, permit software improvements, and Housing and Neighborhood Action Plans. Housing-related comments from these efforts can be found in Attachment E.

Next Steps

Moving forward, the City staff will conduct the following.

- Upload the revised Draft Housing Element and comment letters to the City's website.
- Submit the revised Draft Housing Element to the California Department of Housing and Community Development for them to begin their State required compliance review.
- Conduct follow-up interviews with stakeholders to see what else is needed and what other groups/residents should be contacted.
- Continue outreach on the Draft Housing Element and Housing Action Plan consistent with the feedback from the stakeholder interviews and the options included in this letter.

Again, City staff would like to thank everyone who contributed to Draft Housing Element and Shape Stockton efforts. While much work remains, City staff appreciates the feedback received and looks forward to working with the community to address housing in the City of Stockton.

If you have any questions regarding the information in this letter, contact me by phone at 209 937-8598 or by e-mail at matt.diaz@stocktonca.gov.

Matt Diaz

Matt Diaz, AICP
Advanced Planning Manager

Attachments

A. Annotated St. Mary's Dining Room Comment Letter dated May 12, 2023
B. Annotated Stockton Housing Justice Coalition Comment Letter dated May 12, 2023
C. Annotated Disability Rights California (DRC) Comment Letter dated May 15, 2023
D. Revised Housing Element Policy Chapter with Track Changes
E. Shape Stockton Housing and Neighborhood Comments

St. Mary's Dining Room
...more than meals

May 12, 2023

Input on the Draft Housing Element

Dear City of Stockton,

Thank you for the work that the Shape Stockton team has done in developing the first draft of the Housing Element. They have been very open to input and encouraging community participation. I appreciate this opportunity to provide our feedback as well.

St. Mary's is one of the largest homeless service agencies in Stockton, serving over 5,000 individuals a year. We provide meals, showers, clothing and social services to homeless individuals who are staying in the shelters, residing in the encampments, or living in their cars. We also serve households from the surrounding low-income neighborhoods who are very low income and at risk of homelessness. For our clients, the lack of housing to fit their needs is extremely detrimental.

The main component that I feel is missing from the Housing Element is a housing plan for extremely low income households. It is a sub-category of the larger group titled "Very Low Income". This category covers a wide range of incomes - anyone below 50% of area median income. This category is too broad and does not adequately address the needs of the lowest income households. It appears that there is no specific Regional Housing Needs Allocation for the extremely low income sub-category.

I feel that specific planning is needed to address the housing needs of those with extremely low incomes (below 25% AMI). This includes many individuals with a disability, an increasing number of seniors, and others with special needs. Housing to meet their needs is critical to both preventing homelessness and helping people exit out of homelessness. We have many clients who come to us because their rents kept increasing until they became so high that they could no longer afford them, so they had to move out into an emergency shelter. Similarly, when our clients are working to move out of a shelter, they are often unable to find any apartment that they can afford or landlords who will accept their income level, so they remain stuck at the shelter.

The Housing Element can be an important piece of addressing this problem, by developing a comprehensive housing plan to ensure adequate housing for those with extremely low incomes.

Thank you for your consideration.

Petra Linden

Petra Linden
Chief Executive Officer

Commented [GU1]: The Extremely Low Income RHNA is estimated based on HCD guidance on page BR-10. In addition, more information about residents in this income category is provided on page BR-43.

Commented [GU2]: Program 7 and 10 address Extremely Low Income households.

545 W. Sonora Street, Stockton, CA 95203 • (209) 467-0703, Fax (209) 467-7795 www.stmarysdiningroom.org • Tax ID 94-2687280

May 12, 2023

To: Stephanie Ocasio, Director of Community Development

Matt Diaz, Advanced Planning Manager
Tristan Osborn, Senior Planner, Advanced Planning

Placeworks

Mayor Kevin Lincoln
Vice Mayor Kimberly Warmsley
Councilmember Michelle Padilla
Councilmember Dan Wright
Councilmember Michael Blower
Councilmember Susan Lenz
Councilmember Brando Villapudua

Cc: David Zisser, Assistant Deputy Director, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Jose Ayala, Housing Policy Specialist, HCD

RE: City of Stockton 6th Cycle Draft Housing Element

Dear Community Development Department Staff, Consultants, Mayor Lincoln, and City Councilmembers,

Thank you for the opportunity to comment on the 6th Cycle Draft Housing Element for the City of Stockton.

The Stockton Housing Justice Coalition is a resident-centered organization that empowers Stocktonians to advocate for policies and solutions that protect tenants and promote affordable housing through skill-building, education, organizing and storytelling. The following comments, questions and recommendations to the 6th Cycle Draft Housing Element are informed by the Coalition's direct experience with affordable housing in the City of Stockton as well as our experience interacting with residents and attempting to address their housing needs.

Policy Document

The Coalition appreciates the draft's focus on housing production. This focus is weaved throughout nearly all of the stated Goals and associated Policies. However, production-oriented policies on their own do not respond directly to the analysis conducted elsewhere within the

Draft Housing Element.

While production is an essential component of any effective plan to improve housing outcomes, the Needs Assessment and the Affirmatively Furthering Fair Housing sections indicate that feedback from local stakeholders focused heavily on the need to stabilize households that are threatened by housing insecurity and/or homelessness. There are currently no policies noted throughout the five goals that commit in a measurable way to protecting tenants or stabilizing shelter for those households that are housing-insecure.

It is also difficult to assess whether the Quantified Objectives for certain goals are reasonable because it is not clear that there has been analysis as to whether existing programs are being effective in impact. For example, under Goal HE-2: Provide High Quality Housing for All Income Groups, Program 10 states that the City will continue administering its existing entitlement programs to fund local housing programs to support the development of 200 extremely low-, 400 very-low and 450 low-income units. It also states that 75 low-income households will receive assistance from the City's down payment assistance program. The only evaluation data the Coalition was able to review is in a draft of the City's 2021-2022 Consolidated Annual Performance Evaluation Report - CAPER (the final draft does not appear to have been posted on the City's website). It does not appear that any households within the CAPER reporting period received assistance for any type of down-payment assistance and the report states that over the two-year reporting period, 10 units within a 31-unit development were supported with HOME funds. If down-payment assistance is not being utilized - the Constraints analysis indicates that from 2017 - 2023 no households were assisted by the down-payment program - and only 10 units are noted as being supported by HOME, does maintaining this status quo meet the housing needs of Stockton residents? It does not appear so and the Coalition requests that the City ensure the Quantified Objectives take into consideration historical utilization rates for its proposed programs and assess how these programs can be improved.

Program 10 also highlights another trend throughout the Policy Document that the Coalition would like to see addressed - a general lack of specificity as it relates to implementation time frames. Program 10 states that the City will "Review funding opportunities annually; down payment assistance program is ongoing." This language lacks a clear commitment to achieve the stated Quantified Objectives and similar non-committal language is used throughout.

- <u>Goal HE-1 Increase Housing Production and Ensure Adequate Land for All Housing Types and Income Levels</u>
    - Recent changes to state law have spurred an increase of Accessory Dwelling Units across the state as a response to natural disasters and homelessness. The Coalition is pleased to see the City is continuing its efforts to increase ADUs across the City with focus on high opportunity neighborhoods. Given the City's quantified objective of 180 ADUs, (108 units in the low-income category in Table

Summary of Comments on A9g2imqt_18ssekm_380.tmp

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Number: 1 Author: Matt Diaz Date: 5/31/2023 3:12:00 PM

The CAPER is on the Economic Development Departments' website at Economic Development Department - City of Stockton (stocktonca.gov) .

Staff will continue to explore potential impediments to the CAPER's achievements and successes.

Number: 2 Author: Matt Diaz Date: 5/31/2023 1:52:00 PM

City staff has been tasked with following up on various complex housing solutions to address everything from staffing shortages, rent control, balancing the need to enhance housing development without leading to increased costs, and so on. While staff agrees that having specific milestones for all objectives would be helpful, the progress of some of the efforts will be dictated by the process in which they are explored and the direction giving to staff as progress is made.

HE-53), the Coalition would like to see the City explore a pilot program (similar to LA County) that would ensure newly constructed (or converted) ADUs are affordable to individuals or households in low-income categories by providing incentives to homeowners (such as forgivable loans or grant assistance for construction).

- Goal HE-2 Provide High Quality Housing for All Income Groups
    - All [1] stated programs within Goal 2, with the exception of Program 11, appear to only maintain the existing status quo. If existing programs are not meeting current housing needs, it is unclear how this section will improve upon existing outcomes.

- Goal HE-4 Preserve Existing Housing

    - The Coalition appreciates the draft element includes a goal explicit to housing preservation. We believe there are more explicit program goals that could be included to strengthen the focus of this section and make it more likely that a variety of preservation efforts could be explored. The City of Stockton can have a positive impact on increasing the supply of affordable homes through policies that prioritize residents and community development organizations over corporate and/or outside investors in the real-estate market. This [2] can be achieved through the inclusion of both a Community/Tenant Opportunity to Purchase Act (COPA and TOPA) policy.
    - It is well documented that a majority of low-income households do not have access to deed-restricted affordable housing. The Coalition would like to see the City establish a formal small site preservation program that would support mission-driven nonprofit developers in acquiring existing non-deed restricted units and bringing these units into the City's formal affordable housing stock.
    - Challenges with the City's existing Code Enforcement model have long been uplifted by the community as failing to meet the needs of residents. There have been repeated suggestions that the City adopt a more proactive form of code enforcement and rental inspection process. Program 21 proposes no significant changes to the existing code enforcement/rental inspection model and offers no meaningful timeline for assessment or updates.

- Goal HE-5 Provide Equitable Housing and Supportive Services
    - The Coalition believes the policies and programs noted under Goal HE-5 could be significantly strengthened. Equitable housing policies should [3] address the entire continuum of housing need - including protecting tenants. Approximately

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Number: 1 Author: Matt Diaz Date: 5/31/2023 1:58:00 PM

Chapter 7 Evaluation includes a detailed description of how the goal/policies were either carried over, amended, or removed. While high-quality housing remains a constant, the programs were consolidated with others to provide more clarity and are intended to work with other programs for policy implementation.

Number: 2 Author: Matt Diaz Date: 5/31/2023 1:59:00 PM

Staff will continue to explore this program and discuss findings with the Justice Coalition.

Number: 3 Author: Matt Diaz Date: 5/31/2023 1:52:00 PM

Financial options will be explored in the Housing Action Plan, while the Development Code will include amendments to ADU and JADU standards as well.

half of Stockton's population (50.1 percent) is comprised of renter households and a significant number of renters dwell in single-family homes which are exempt from any protective measures in AB 1482. The Coalition would like to see more explicit policies surrounding renter protections such as extending just-cause eviction policies to single-family rental units, actual enforcement of preventing source of income discrimination and tenant-anti-harassment policies.

SITE INVENTORY

CalEnviroScreen 4.0 is a screening methodology that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. It also takes into account housing burden, population characteristics, education, poverty etc. Most of Stockton's RHNA sites appear to be located south of Harding Way within neighborhoods that have the highest percentile of burden (81% and above as shown in Figure 15) and are categorized as Low Resource" and/or "High Segregation & Poverty" (Figure HE-1: TCAC/HCD Opportunity Areas) areas.

On April 12, 2023, Housing Justice Coalition members conducted a site tour of proposed Site Inventory locations. Our observations are noted in the following comments:

- Multiple sites are listed as being less than a half-acre in size. Due to economies of scale, it is highly unlikely that low-income, affordable housing would be constructed on these parcels. The Coalition recommends that the City remove such sites from the inventory due to them being infeasible for residential development.

- The Coalition urges the City of Stockton to consider environmental and health impacts of proposed inventory locations. For example, sites adjacent to freeway and freight corridors may be unsuitable for housing development due to pollution concerns (e.g. site locations).

    - APN: 14523013 & 14523012 (Church St.)
        - While there are no major structures on either of these parcels, at the time of the Coalition's site tour, it appeared that Greif Recycling was operating on this parcel and possibly the adjacent one. Additionally although these parcels are zoned for Medium Density Residential (RM) the surrounding area has a high concentration of industrial businesses.
    - 4236 MANTHEY RD STOCKTON CA 95206
        - This parcel and its adjacent ones are in close proximity to the freeway. If planned development is considered, the Coalition recommends additional mitigation efforts to offset the impacts of its proximity to the freeway.
    - 411 S STANISLAUS ST STOCKTON CA 95203

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Number: 1 Author: Guest User Date: 5/25/2023 1:56:00 PM
Revisions have been made to Program 28 in the Policy Document to address this comment•

Number: 2 Author: Guest User Date: 5/25/2023 1:21:00 PM
None of the sites to address the lower income RHNA are less than a half-acre in size. The part of state law concerned with sites smaller than a half-acre is specific to sites that list units to address the lower-income part of the RHNA. Sites smaller than a half-acre are only included to address the moderate and above-moderate part of the RHNA••

Number: 3 Author: Guest User Date: 5/25/2023 1:21:00 PM
This site is being removed from the Draft Housing Element•

        - This parcel and its adjacent ones are in close proximity to the freeway. If planned development is considered, the Coalition recommends additional mitigation efforts to offset the impacts of its proximity to the freeway.
    - 850 E HAZELTON AVE STOCKTON CA 95203
        - This parcel is located in a General Commercial zoned area and is currently being used as a semi-truck parking and/or over flow lot.

.

Affirmatively Furthering Fair Housing

According to AB 686: Affirmatively Furthering Fair Housing (AFFH) Stockton is required by State law to use all available data and "local knowledge,"such as the recent testimony of residents and community organizations, to conduct an in-depth analysis of the fair housing issues impacting members of protected classes. The Draft correctly demonstrates that residents who are members of protected classes – in particular, people of color – are unfairly and disproportionately harmed by housing costs, eviction, overcrowding, and displacement. However, the proposed goals, policies and programs do not explicitly address feedback or ideas gathered from stakeholders including interventions such as:

- Eviction protection programs
- Right to counsel/legal aid support for renter households
- Deconcentrating poverty in the Downtown and South Stockton neighborhoods.

Additionally, other goals of AB 686 are to, "replace segregated living patterns with truly integrated and balanced living patterns and transform racially and ethnically concentrated areas of poverty into areas of opportunity". However, Figure HE-1: TCAC/HCD Opportunity Areas shows a significant number of sites in "Low Resource" and/or "High Segregation & poverty" as well as multiple "Pipeline Projects" in areas of High Opportunity as defined by HCD, but does not indicate whether these units will be affordable to specific income levels.

Ultimately, the Coalition feels that the current draft element makes the below listed "mistakes" identified by HCD to varying degrees:

- A high-quality Assessment of Fair Housing, but status-quo actions/programs
- Does not include regional comparison in analyses
- Does not ask the public to provide input on AFFH
- Doesn't prioritize 4-5 contributing factors & connect to programs
- High resource areas can't rely on ADUs alone
- No data dumping! Tell the story

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Number: 1 Author: Guest User Date: 5/25/2023 1:21:00 PM
This site is being removed from the Draft Housing Element•

Number: 2 Author: Guest User Date: 5/25/2023 1:23:00 PM
The units and what income levels they are affordable to for the Pipeline Projects are shown in Table HE-54•

Number: 3 Author: Guest User Date: 5/25/2023 1:23:00 PM
The Assessment of Fair Housing does include a regional comparison in the analysis•

Number: 4 Author: Guest User Date: 5/25/2023 1:23:00 PM
Contributing factors have been prioritized and connected to actions in the Policy Document. See Table HE-50 and the text above that table.•

Outreach and Engagement
The City must reach ALL economic segments of the population; describe meaningful, frequent, and ongoing community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall housing element.

While several meetings were hosted by the City Community Development Department, these meetings did not reach significant portions of the City population; namely, renters (who make up approximately half of all Stockton households) and people at risk for or who are homeless. The City's method of communication with the public was primarily by online notices on its own web site. However, most working class people living in the City will not visit the City's website to find out about the Housing Element because most residents aren't aware it exists. Also, 30 percent of Stockton residents lack internet access which poses an additional challenge to accessing online materials.

All segments of the community were encouraged by the City to participate in preparation of the Housing Element through a series of efforts, including noticing of property owners of sites in the draft Housing Element sites inventory, announcements on the City's social media channels, distribution to the Housing Element email listserv, and direct contacts by email and phone with organizations serving low-income and special-needs groups. The City invited representatives of these groups to attend the public workshops on the Housing Element.

It should be noted that representatives who serve members of the community are not the same as community members themselves. Second, noticing property owners and no one else, i.e. those who rent, and those who are unhoused, ignores extensive economic segments of the community. There are no examples of the City reaching out to the Spanish-speaking community in a way that is meaningful. As such, the Coalition does not believe the City of Stockton has met its outreach obligations under AB 686.

Recommendations
Based on the above discussion, the Stockton Housing Justice Coalition would like to make the following recommendations to help strengthen the Draft 6th Cycle Housing Element and ensure its responsiveness to local housing need:

- Policy Document
    - Add more specificity to Quantifiable Objectives and Timeline language to ensure realistic and meaningful outcomes on a timeline that ensures some accountability
    - Broaden Goal HE-5 to include explicit reference and recommendation to Resident Protection policies to ensure housing, neighborhood stability and affirmative displacement mitigation for Stocktonians

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Number: 1 Author: Matt Diaz Date: 5/31/2023 3:09:00 PM

The City has been dispersing flyers in multiple languages at libraries, businesses, and stakeholder groups, but we can work to expand this to other areas that need them.

Number: 2 Author: Matt Diaz Date: 5/31/2023 3:07:00 PM

All shape stockton notices were in five languages, while all housing and zoning workshops were noticed in Spanish and english. These notices can be found on the City's shape stockton website.

    - Increased collaboration with the Transformative Climate Communities programs and partners to provide professional services (reroofs/electrical upgrades) to low-income household housing stock
- Site Inventory
    - Remove any existing inventory sites that sit within 500-feet of freeway to avoid disproportionately negative health and environmental impacts on low-income households
    - Consider additional sites in high opportunity neighborhoods
    - Additional review of parcels with low acreage that have lower-income capacity
- Outreach/Engagement
    - The City should improve its outreach methods and expand its reach to include youth, those from different language communities and unhoused residents. These are populations who are disproportionately affected by the City's housing policies and the lack of inclusion of their feedback is evident in the policies and programs selected.
    - Conduct additional outreach, if time allows, and partner with community-based organizations to support additional engagement

We look forward to working with the City of Stockton to develop policies and programs that meet the housing needs of all Stocktonians.

Sincerely,

Stockton Housing Justice Coalition

Organizational and individual members include*:

- STAND Affordable Housing - Trustbuilders
- Conway Homes Resident Council
- Pandora Crowder
- Enterprise Community Partners
- Faith in the Valley
- Residents United Network - Visionary Home Builders of CA, Inc.
- Catholic Charities
- Disability Rights of California
- California Coalition for Rural Housing
- Stockton NAACP
- San Joaquin Fair Housing
- New Genesis Housing Corporation
- Reinvent South Stockton Coalition

**Coalition comments do not necessarily reflect the views of individual member organizations*

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Number: 1 Author: Matt Diaz Date: 5/31/2023 3:06:00 PM

The city's response letter dated 6/2/23 outlines additional outreach options. We look forward to working with the justice coalition to explore ways to reach more residents in 2023 and beyond.

On May 3, 2023, the Stockton Housing Justice Coalition held a public, community meeting to discuss the Draft 6th Cycle Housing Element. The following housing barriers and desired policies and programs were identified by participants:

Issue/Barriers

- Lack of housing for low-income residents + emergency placements
- Creating housing in vacant properties
- Housing for people with disabilities
    - On SSI
    - Even with benefits, still unaffordable → need to have a universal definition of what low-income is and what is affordable
- Keeping people in their homes → tenant protections
- Low-income people of color only able to live in polluted + undesirable places
- Acceptance of housing vouchers → discrimination
- Transitional housing for formerly incarcerated
- Housing stock quality
    - Tenant resources → navigation
- Criminalization of unhoused residents
- A lot of vacant buildings in downtown
- Tenant bill of rights, including Right to Counsel
- Environmental (racial, social) justice → housing near polluted sites
- Concentrating poverty → new units all together, without amenities

Desired policies and programs

- New tenant protection policies
    - Funding legal aid
- Preservation programs for existing market housing
- Community land trusts
- Vacant building tax
- Enforcement against discrimination
- Public education on rights + processes (radio, classrooms)
- Navigation for unhoused
- HDAP at CA DSS → housing while applying for SSI
    - Needs to be bigger
- Extending “Just Cause” to single-family
- Universal Income for renters
- Mitigation requirements for siting in industrial + highway areas
- Eviction diversion program
- Inclusionary requirements for specific groups → domestic violence victims

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Number: 1 Author: Matt Diaz Date: 5/31/2023 3:17:00 PM

Most of these are included in the revised Policy Chapter of the Housing Element either as programs or directions for staff to explore. Some will be explored in the Housing Action Plan for recommendations (vacant buildings, etc.), while others (ADU, etc.) may be included in the Development Code Update.

- Sidewalks
- Audit of existing programs
- More mixed-income siting → choice
- City should buy more land everywhere for future development
- Partnering with school districts for teacher housing
- Rent control/lower + enforcement rent cap
- Help for people + remove barriers on rental applications
    - Credit
    - Domestic violence victims
    - Exceptions or minimums
- Mitigate landlord concerns → cleanup funds, etc.
- More landlord/tenant mediation
- Require provision of written lease
- Rental registry
- Grants for ramps
- Subsidies for ADUs → streamlining

Disability Rights California
California's protection & advocacy system

LEGAL ADVOCACY UNIT
1831 K Street
Sacramento, CA 95811-4114
Tel: (916) 504-5810
Fax: (916) 504-5811
coprinforequest@disabilityrightsca.org
www.disabilityrightsca.org

May 15, 2023

Sent via e-mail

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Vice Mayor Kimberly Warmsley- Kimberly.warmsley@stocktonca.gov
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Councilmember Dan Wright- dan.wright@stocktonca.gov
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Melinda Coy, Land Use and Planning Manager, HCD- Melinda.coy@hcd.ca.gov
Jose Ayala, Housing Policy Specialist- jose.ayala@hcd.ca.gov

RE: Disability Rights California's Comments on the City of Stockton's April 2023 Housing Element Public Draft

Dear Planning Department Staff, Consultants, Mayor Lincoln, and City Councilmembers:

Disability Rights California submits these initial comments on the 2023-2031 City of Stockton Housing Element April 2023 Public Review Draft ("Draft"). Disability Rights California is a private, non-profit disability rights organization federally mandated to advance and protect the human and legal rights of Californians with disabilities. 42 U.S.C. § 15001, et. seq., 42 U.S.C.§ 10801, et seq., 29 U.S.C. § 794(e), 29 U.S.C. § 3011, 29 U.S.C. § 3012; *see also* Welfare and Institutions Code §§ 4900-49005. DRC's comments on the Draft pertain to people with disabilities in the City of Stockton.

We appreciate the effort that went into this first draft and support many of the Draft programs. However, we believe the Draft needs further development to address housing needs and barriers for people with disabilities in the City. We provide the following comments and proposed changes to assist the City with creating a more inclusive Housing Element:

I. To Affirmatively Further Fair Housing, the City must outreach to all segments of the community, ensure housing opportunity throughout the community, set AFFH priorities, and set appropriate metrics and milestones.

Assembly Bill 686 (2018) defines Affirmatively Furthering Fair Housing as, "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." Gov. Code § 8899.50, subd. (a)(1). Stockton must administer its programs in a way that affirmatively furthers fair housing for members of a protected class and take no action inconsistent with that obligation. Gov. Code, § 8899.50(b)(12); Fair Housing Act, 42 U.S.C.A. § 3608(e)(5). These requirements exist to combat discrimination, overcome patterns of segregation, and foster inclusive communities.

While the federal duty to AFFH has existed for over 50 years, AB 686 creates new requirements for housing elements for: (1) Outreach, (2) Assessment of Fair Housing, (3) Site Inventory, (4) Identification and Prioritization of Contributing Factors, and (5) Goals and Action. The California Department of Housing and Community Development's publication: *Implementing AB686: Duty to Affirmatively Further Fair Housing Guidance for Housing Elements* states that common mistakes and pitfalls include:

- A high-quality Assessment of Fair Housing, but status-quo actions/programs;

- A local jurisdiction refers to a county-level Analysis of Impediments to Fair Housing previously completed;
- Does not include regional comparison in analyses;
- Only analyzes patterns of low-income sites, not all sites;
- Does not ask the public to provide input on AFFH;
- Doesn't prioritize 4-5 contributing factors & connect to programs;
- High resource areas can't rely on ADUs alone; and,
- No data dumping! Tell the story.

The City's Draft contains some of these common mistakes. We offer the following comments to help avoid some of these pitfalls.

1. Outreach

The City must reach all economic segments of the population; describe meaningful, frequent, and ongoing community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall housing element.[1] Gov. Code, § 8899.50 subd. (a)(2) further requires a summary of fair housing outreach and capacity, and the City must "receive public input and local knowledge on the Assessment of Fair Housing."

The Planning Department hosted several meetings , but did not reach renters and people at risk for or who are unhoused. The City primarily communicated with the public by online notices on its web site; however, most working people in the City do not visit the City's website. The Draft also does not incorporate local knowledge other than input from service providers.

While we appreciate the outreach to organizations serving low-income and other special needs populations, including our own, representatives who serve members of the community are not the same as community members themselves. Noticing property owners but not those who rent and those who are unhoused ignores extensive economic segments of the community. Moreover, there are no examples of the City reaching out to the Spanish-speaking community in a way that is meaningful. Additionally, people with disabilities and older adults are often unable to participate in community meetings due to communication barriers, segregation, and lack of transportation access. Thus,

Commented [MD1]: In 2023, all Shape Stockton notices were sent in five languages, while all workshops were noticed in Spanish and English. The City will continue to work with residents and groups to extend its reach. In addition, the Housing Element has been revised to encourage more noticing in various languages so the practice will continue beyond the Housing Element Update process.

[1] The CA Dept. of Housing and Community Development, *Implementing AB686: Duty to Affirmatively Further Fair Housing Guidance for Housing Elements,* https://www.hcd.ca.gov/community-development/affh/docs/affh_webinar_slides.pdf

they are often not considered in the planning processes that directly and disproportionately impact them, and are undercounted in data collection. Hearing directly from people with disabilities is critical to figuring out what housing issues they face and what types of housing works for them. Having a robust community outreach and engagement plan that ensures access to meetings and planning processes will allow program participants to gather invaluable data and information from people with disabilities and bridge the equity gap.

To better incorporate the views of all Stocktonians, the City should implement a Housing Element education campaign to educate young people, those from different language communities, and those awaiting appointments at the County's Health and Human Services Agency (333 E. Washington St.), among others. The City should reach out to the community via local radio stations in both English and Spanish. There is no other way to reach the vast working poor, disabled, renting, and homeless populations of Stockton. The people of Stockton deserve to have their voice heard in the Housing Element process. Under AB686, it is mandated.

2. Assessment of Fair Housing

Among the Assessment of Fair Housing's Requirements, we primarily address disparities in access to opportunity, displacement risk, ongoing segregation, and sites selection in this comment letter.

The City of Stockton has a population of 322,120.[2] People of color make up 78 percent of the population where Latinx people account for more than 40 percent of that total. *Id*. Stockton is the native land of the Yatchicumne, a group of Northern Valley Yokuts people.[3]

A. Disparities in Access to Opportunity

a. Environmental Justice

A major fair housing concern in Stockton is environmental injustice. Importantly, "[p]eople with disabilities are specifically exposed to and vulnerable to environmental injustice" as a result of decades of ableist and racially exclusionary policies and land use decisions. And, some are also more vulnerable

[2] Rich Ibarra, Stockton Named the Most Racially Diverse City in America, Capradio, (Jan. 2020)
[3] City of Stockton: A Look into Stockton's Past

to environmental injustice because of the nature of their disability.[4] These communities are the most impacted by pollution and other poor environmental conditions because of historic land-use decisions. For example, the percentage of people with disabilities living in areas with greater exposure to PM2.5 pollution is significantly higher than in areas with less exposure, even when controlling for other variables; this is especially true for individuals with cognitive and independent living difficulties.[5] As a result, explicitly requiring consideration of such issues when furthering fair housing is critical.

CalEnviroScreen 4.0 is a screening methodology that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. Much of Stockton falls above the 90th percentile for pollution burden in the state. In the map below, Red indicates communities with the highest pollution burdens: most of Stockton's RHNA sites are within those red zones. As shown in Figure 1 below[6], limited RHNA sites are located in the green CALENVIROSCREEN and deeper blue, high and highest resources areas, as the majority of sites are in South Stockton. However, as the table below shows, South Stockton are the lower opportunity areas, and are also the areas hit by some of the worst pollution in the entire state. This will not AFFH.

Commented [MD2]: The Housing Elements Regional Housing Needs Allocation (RHNA) housing capacity sites include approved housing projects in North Stockton that account for over ten thousand units. The maps and description below only show vacant infill properties that account for 50-percent or less than the total sites listed towards complying with RHNA.

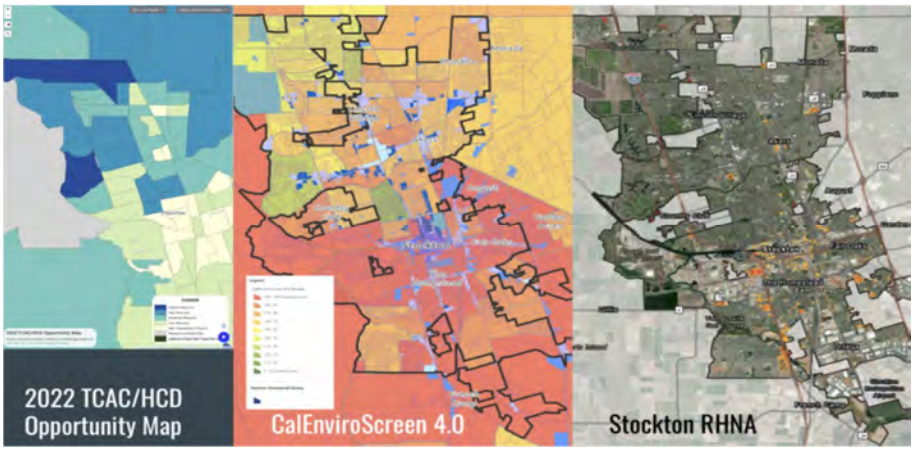


Figure 1

[4] Catherine Jampel, Intersections of disability justice, racial justice, and environmental justice, Environmental Sociology (2018).
[5] Jayajit Chakraborty, Disparities in exposure to fine particulate air pollution for people with disabilities in US, Science of the Total Environment (June 2022).
[6] *Stockton 6th Cycle Housing* Element, UC Berkeley, prepared by Bailey Schweitzer, Weiyang Tang, Joann Martinez (Dec. 2022).

b. Transportation

Transportation access is a critical piece of fair housing. However, jurisdictions often focus narrowly on the Americans with Disabilities Act's technical requirements for fixed route and paratransit, but overlook its broader mandate for equal access to the transportation system as a whole. The type of transportation necessary varies by disability and need, and it should be clear that jurisdictions should consider not only fixed-route public transportation, but also specialized services such as paratransit, dial-a-ride, reduced-fare taxis, or volunteer driver programs. Stockton should also consider availability of parking, drop off locations, bus stops, and shelters. A stronger transportation system would expand and improve affordable mobility options including: paratransit, door-to-door services; wheelchair accessible transportation network companies, and demand response real time ride systems; volunteer driver program expansions; nonprofit service provider systems; stipends/free rides for caregivers; gas subsidies, and more. The City's analysis of parking standards notes that some parking minimums have been waived for affordable housing, or that built via TOD. Unfortunately, the ADA's only technical requirement regarding parking spots for people with disabilities is that there be a percentage of spots for disabled persons. Any percentage of zero is zero. Not all disabled people can use public transit, and require a parking spot, a spot for their caregiver, or a pickup spot for paratransit vehicles. As explained below, We recommend that the City amend Program 27, Addressing the Needs of Those with Disabilities, to develop an overall accessibility program that includes ensuring that disabled parking spots are available even where parking minimums have been waived. Accessible, available, and affordable travel options make it possible for diverse groups of people to stay active and engaged in their communities.

Commented [GU3]: Revisions have been made to Program 29 to address this comment

Commented [GU4]: Revisions have been made in the Potential Housing Constraints section in the Parking Standards subsection to address this comment.

c. Houselessness

As discussed below, unhoused individuals have a high prevalence of disability. A discussion of barriers to fair housing is not complete without recognizing that Stockton recently passed one of the most onerous and restrictive encampment sweep ordinances in California, which bans "camping" (defined as "to place, pitch or occupy camp facilities; to live temporarily in a camp facility or outdoors; to use camp paraphernalia") in areas broadly defined as "critical infrastructure" at the risk of misdemeanor charges and up to $25,000 in daily fines. The term critical infrastructure is defined to include locations ranging from hospitals to parks. Stockton, California Municipal Code, Charter, and Civil Service Rules, Title 8 Health and Safety, Chapter 8.100 Protection of Critical Infrastructure and Wildlife

Risk Areas.[7] Further, while the Ordinance was specifically created to address symptoms of homelessness[8], it does not include a requirement that people have true access to services or housing before being removed or having their property taken. This must be assessed as a barrier.

Commented [MD5]: Staff believes this does not create a barrier to establishing or being housed in a new shelter as defined by state law.

B. Displacement

We appreciate that the City recognizes that preservation and creation of affordable housing is critical to minimizing displacement risk. However, the City has recognized that the City is at risk of losing naturally occurring affordable housing due to an influx of Bay Area residents. Research and experience demonstrate that effective anti-displacement measures include housing preservation (especially for naturally occurring affordable housing), tenant protection, and affordable housing strategies.[9] The City commits to programs addressing housing preservation and affordable housing development, but not tenant protection. And some of its programs, for example, Program 14, is listed as a place-based revitalization strategy; but fails to address how to ensure that weatherization does not result in higher rents and ensuing displacement. A deeper level of analysis is necessary. Similarly, if not done with anti-displacement protections in place, Code Enforcement can do, and has done, the same.[10] Indeed, the City discusses revitalizing "blighted" areas but does not explain what "blighted" means, which neighborhoods might be impacted, and how. Historically, revitalization of blighted neighborhoods has been paired with displacement of low-income communities. Indeed, the City is removing its 5th Cycle Element program that noted that development in blighted areas would be done with an eye toward preventing gentrification. The City must engage in a deeper analysis of such risk and how its own programs can exacerbate or mitigate that risk.

Commented [MD6]: City staff agrees that some programs could impact other programs regarding the need to rehabilitate housing and inclusionary fees and housing costs. The Housing Element directs staff to further explore the implementation of all programs (including funding), while the Housing Action Plan will make further recommendations to better implement housing policy. These programs will be monitored annually as required per state law.

Commented [MD7]: The previous element did not discuss displacement, while the current element includes new policies to address state law and feedback received.

Displacement can create unique harms to people with disabilities, who may have developed formal and informal systems of care, developed accessible transportation routes, and/or modified their homes to accommodate their needs. Displacement can disrupt these systems in a way that is devastating to a person's health. And, the stress of displacement alone can exacerbate symptoms of

[7] https://library.qcode.us/lib/stockton_ca/pub/municipal_code/item/title_8-chapter_8_100
[8] https://www.stocktonmayor.org/files/Legislation%20Text%20(9).pdf
[9] Karen Chapple and Anastasia Loukaitou-Sideris, White Paper on Anti-Displacement Strategy Effectiveness, February 28, 2021, available at www.urbandisplacement.org/wp-content/uploads/2021/08/19RD018-Anti-Displacement-Strategy-Effectiveness.pdf.
[10] See, e.g. *Price v. City of Stockton*, 394 F. Supp. 2d 1256 (2005)(holding private right of action of federal relocation laws where aggressive code enforcement shut down SROs).

disabilities. Therefore, we also believe it is important to include programs that have the most immediate impact on preventing displacement. "[N]eighborhood stabilization and tenant protection policies have the most direct and immediate effect on mitigating displacement"[11] – this includes a strong local rent stabilization program, including for mobilehome parks. Therefore, as explained below, we urge the City to include such a program in its anti-displacement programs. Given the City's indication that it will create neighborhood action plans in neighborhoods that are susceptible to gentrification, like Little Manila, this is a critical AFFH issue.

Commented [MD8]: Housing Analysis and interviews with the development community have indicated that the housing market (rental/sales) in Stockton does not have the capacity to absorb significant fee increases or significant losses in revenue that would impact the net operating income (NOI). While the Housing Element policy has been revised to direct staff to continue to explore financial assistance (upfront and ongoing cost), topics like rent stabilization will need to be explored in more detail with additional market research and outreach.

C. Legacy of Redlining, Segregation, and Urban Renewal: RECAPS and RCAAs

The discriminatory impacts of Stockton's past redlining endure to this day as well. Redlining is the term for the process that spatially segregated the affluent white population from the predominantly Black and "economically disinvested". The zones were categorized by a color scale, and Green indicated the most affluent and white neighborhoods. While Red, represented the non-white areas. Comparing the 1930s Home Owner's Loan Corporation redlining map to today's demographic makeup proves this segregation persists in modern-day Stockton. The map on the right displays the original Redlining zones within modern-day Stockton boundaries.

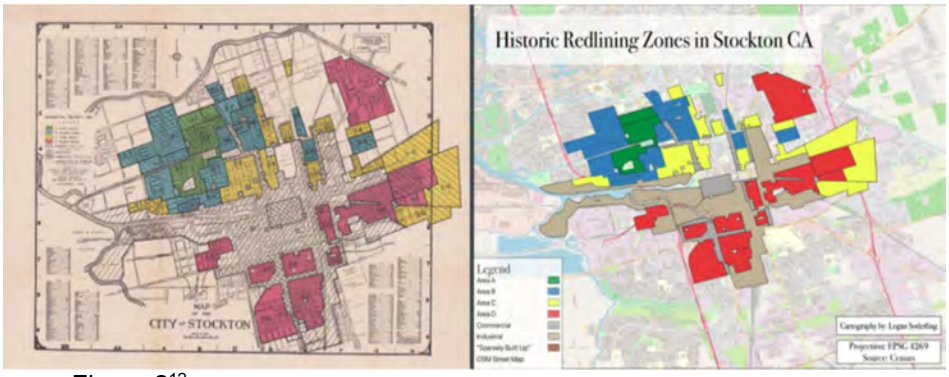


Figure 2[12]

[11] *Id.*
[12] Stockton 6th Cycle Housing Element, UC Berkeley, prepared by Bailey Schweitzer, Weiyang Tang, Joann Martinez (Dec. 2022).

According to AFFH mapping tools by HUD and HCD we see that segregation still exists and has affected housing policies. (See Figure 3).

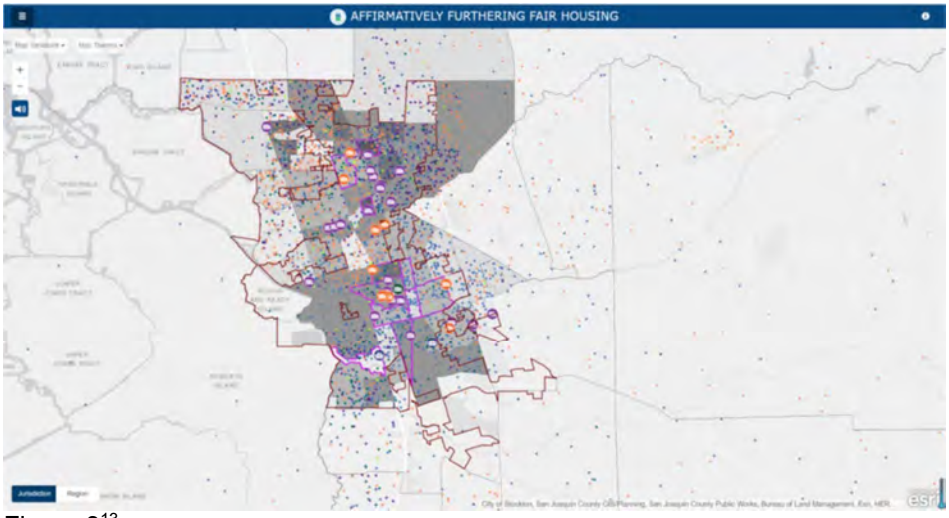


Figure 3[13]

For example, decision makers built a freeway through the Filipino Neighborhood of Little Manila in Downtown Stockton, destroying family homes, businesses, community centers, and much more. Redlining has also excluded many communities of color from homeownership; now over 77% of extremely low income households in San Joaquin County pay over half of their income on rent[14]. We also know that renters of color face the highest rates of cost burden in San Joaquin County[15]. While the City notes that it will work with the housing authority to market vouchers in higher resourced areas, that is not enough to create authentic housing choice. The City should consult with community members to understand better their barriers to housing choice. Further, we understand the Stockton hired consultants to conduct an inclusionary zoning ordinance feasibility analysis, however the results are not included in the current Draft, other than a conclusory statement that such a program is not feasible. The City should at minimum explain why such an ordinance is not feasible in its AFH. The City must also consider how to incentivize affordable housing in RCAAs while also ensuring

Commented [GU9]: Programs 6, 10, 12, 13, 15, 24 and 25 in in the Policy Document address RCAAs

[13] *Id.*
[14] California Housing Partnership, Housing Need Dashboard, (May 2023).
[15] *Id.*

that deed-restricted affordable housing will be prioritized in RE/CAPs that are sensitive to displacement risk. The sites inventory does not currently reflect that.

The City also must address how its existing policies contribute to segregation in its Assessment of Fair Housing. For example, it must analyze how the City's policies toward the unhoused (e.g. towing policies, shelter zoning, etc.) exacerbate segregation. A report completed by students at U.C. Berkley and attached here as exhibit A, highlights the historical segregation patterns of Stockton. Unsurprisingly, the majority of unhoused persons in Stockton are Black and Latinx and continue to exist in the segregated areas of Southern Stockton, whether in shelters, the health and human services system, or in the encampments scattered throughout the City's proposed majority RHNA sites.

The Housing Needs Analysis demonstrates that existing low-income renters are living in rent-burdened, overcrowded, and substandard conditions. Indeed, the overwhelming majority of households with the lowest incomes are severely rent-burdened. We encourage the City to account for this disparity when accounting for housing needs. Additionally, when considering resources, the City should identify ones that can be feasibly used. While working with the County housing authority's Section 8 Housing Choice Voucher program is a laudable undertaking, it is unclear how residents could, once they make it to the top of the lengthy waitlist, obtain housing in the City given the already significant overcrowding and unavailability of appropriately sized units. Market rate housing is clearly not meeting the needs of the City's lowest income households, the overwhelming majority of whom are renters.

3. Site Inventory

AB 686 modified Housing Element Law such that a jurisdiction's Assessment of Fair Housing (e.g. segregation & integration, R/ECAP, etc.) should inform the identification of sites in a manner that AFFH. The site identification requirement must assess whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns. Do they transform racially and ethnically concentrated areas of poverty into areas of opportunity?

Stockton's sites inventory is predominantly located in South Stockton. Per SB6 and AB2011, Stockton should consider doing a more in depth review of failing commercial corridors in high resource areas, rather than in places like South Stockton. Comparing the sites inventory to CalEnviroScreen 4.0 indicates

Commented [MD10]: The City would like to know more about what policies contributed to segregation. The Housing Element requires analysis of the existing General Plan and zoning policy and standards that impact housing in the City. City staff is unaware of any existing policy that results in segregation or increases in unhoused populations.

Commented [GU11]: State required analysis of where and how emergency shelters are allowed in the City's Development code is included in the Potential Housing Constraints section.

Commented [MD12]: City staff will rely on guidance from the state on how to analyze sites to address the RHNA and compliance with under SB 6 and AB 2011.

In addition, City staff is proposing a revision to the Housing Element that would result in a Development Code update to include performance measures for potential housing within AFFH-designated sites to include enhanced design and building materials before construction to help mitigate any surrounding environmental impacts.

that most of the selected sites are located in the heavily polluted downtown and south of downtown. (See Figure 4).

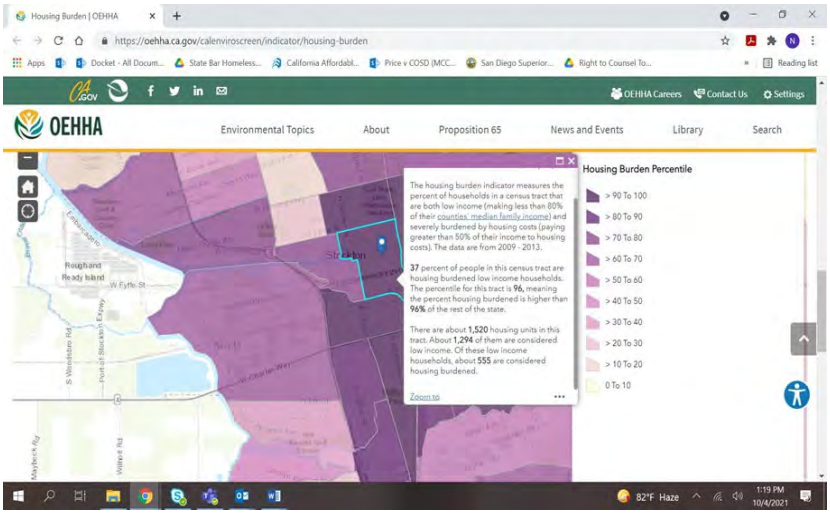


Figure 4: "The housing burden indicator measures the percent of households in the census tract that are both low income (making less than 80% of their counties' median family income) and severely burdened by housing costs (paying greater than 50% of their income to housing costs)…The percentile for this tract is 96, meaning the percent housing burdened is higher than 96% of the rest of the state."

DRC is concerned by the overlap between some of the largest selected parcels and clean-up sites. For instance, the site consisting of parcels 14523013 and 14523012 appear to be the largest selected at just under 40 acres, yet any residential development there would require brownfield mitigation. We commend Stockton for using EPA Brownfield Assessment Grant funds to assess how the city can revitalize current brownfield sites in the city's downtown waterfront. However, the aforementioned parcels are not one such site.

Commented [MD13]: While City staff has recently worked with the owner to rezone the site from medium density housing to commercial general which could allow more commercial and high density residential options, the site will be removed from being calculated towards meeting RHNA. This is due to owner interest to explore other commercial uses in the near term.

According to the EPA, long-term stewardship of former brownfield sites is costly, and the costs of remediation are unknown prior to a site assessment. This means that building housing atop brownfield sites might be financially unviable without a local financial contribution for brownfield clean-up. If Stockton chooses to include numerous brownfield sites in its RHNA inventory, it must be able to

justify that these sites can be cleaned within the eight-year housing element cycle. Otherwise, the city should exclude these sites from their inventory.

The above 40-acre site also contends with significant air pollutants as it is surrounded by multiple highways, a highway interchange, and abuts a rail line. Therefore, even if a brownfield clean-up is conducted, we believe Stockton should avoid encouraging residential development there. More importantly, surrounding areas are often polluted brownfield sites. So, although residents may not be breathing in toxins from the parcel their apartment is on, they may suffer from pollutants on adjacent sites. As such, focusing affordable housing construction on brownfield sites would be a violation of both AFFH and SB 1000 Environmental Justice Element requirements. Given this, we ask Stockton to avoid heavily relying on brownfield sites to meet Stockton's low income RHNA allocation, without having a plan for remediation in place.

Commented [MD14]: None of the sites listed for RHNA compliance are official brownfield or super fund sites. The city acknowledges some analysis may be required as part of the construction review process; however as the sites allow housing by-right, it is reasonable to assume remediation and construction will be achieved within the 8-year cycle. Staff will coordinate this with the State as part of their review.

Further, Disability Rights California participated in a site tour of roughly 25 sites in South Stockton on April 12, 2023 to verify this analysis. Consistent across all 25 sites were the proximity to industrial businesses, lack of transportation, lack of grocery stores, closeness to the I5 and 4 freeways i.e. concerns for pollution, and in some areas, lack of sidewalks and proper lighting. Disability Rights California has talked to community members with disabilities and learned how the lack of sidewalks and proper lighting can prevent neighborhood access and access to opportunity, especially when an extremely limited access to food, goods, and services in the area already exists.

4. Identification & Prioritization of Contributing Factors

The housing element must identify and prioritize significant contributing factors to segregation, R/ECAPS, opportunity access, & disproportionate housing needs. A Fair housing contributing factor is a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Contributing factors should be based on all prior AFFH analyses (Outreach, AFH, Site Inventory). Identification and evaluation of contributing factors must: Identify fair housing issues and significant contributing factors; Prioritize contributing factors, giving highest priority to those factors that most limit or deny fair housing choice, access to opportunity, or negatively impact fair housing or civil rights compliance. It must discuss strategic approaches to inform and strongly connect to goals and actions. Goals and actions should stem directly from Contributing Factors. Prioritization is important (4-5 max), and they must be tailored to local conditions.

The City did not complete this portion of the required AFFH analysis. Fair housing contributing factors have been identified by community members. For example, at the May 3, 2020, Stockton Housing Justice Coalition meeting, Stockton residents cited the following: lack of affordable housing for low income residents, low-income people of color segregated to polluted, undesirable locations; widespread housing discrimination on the basis of disability and source of income; lack of transitional housing or other housing opportunities for formerly incarcerated persons; poor quality of existing housing stock; criminalization of the unhoused; and displacement pressures generally. These are all significant contributing factors to segregation, R/ECAPS, opportunity access, and disproportionate housing needs of communities and individuals because of protected characteristics. The City must complete this analysis and prioritization.

Commented [MD15]: City staff is confident that the proposed AFFH analysis complies with State Law. Other groups and factors that could impact housing (i.e., incarceration) could be explored as part of the Housing Action Plan or other housing efforts conducted with the City's regional partners.

5. Goals, Actions/Programs, Metrics and Milestones

While the Draft Element has a broad AFFH program, many of those programs are existing ones, and the City does not lay out metrics and milestones to determine whether its actions are meaningful.

Program 28, "Practices to Affirmatively Further Fair Housing," at H17-H18 of the Draft states that the City will implement the following strategies to affirmatively further fair housing in coordination with the efforts of this action:

- Strategies to facilitate housing mobility/expand affordable housing in high opportunity areas:
  - Programs 6, 10, 12, 13, 15, 24, 25
- Strategies to reduce or prevent displacement/place-based revitalization strategies:
  - Programs 4, 7, 9, 14, 16, 19, 20, 21, 22, 29

The Draft further states that the City will continue to support fair housing monitoring and enforcement.

While the Draft includes raw demographic data and points to some of its Housing Element Programs as furthering fair housing, it fails to assess whether individuals have actual housing choice and does not identify how it will measure whether its programs are making a meaningful impact. After completing such an analysis of housing choice, the City can turn to fashioning appropriate goals and programs. We have made comments on those below, including suggested revisions to those in the draft; however, the City should ensure that it explains how the programs it suggests will AFFH will actually do so, and how they are

Commented [MD16]: There are a variety of influences that impact a renter's or homeowner's choice beyond financial ability and market conditions. Many of these are discussed in the housing element, but City staff is not sure what "actual housing choice" is alluding to. While Staff is confident the choices described in the draft housing element are consistent with state law, we welcome the chance to elaborate with the DRC further as part of the housing action and neighborhood action plans currently in progress.

connected to the assessment of fair housing. From there, the City must also that include concrete milestones and metrics to evaluate the progress on the programs and fair housing results – otherwise, how will the City know that its programs are meaningfully affirmatively furthering fair housing?

Also, individuals who are chronically homeless, by definition, have a disability; the draft element fails to consider this intersection of needs. Please see below for more comments regarding the City's Homeless Programs.

II. Housing Needs Assessment for People with Special Needs § 65583(a)(7)

The City fails to adequately quantify and analyze the housing needs of people with disabilities. Gov. Code § 65583(a)(7) requires "An analysis of any special housing needs, such as those of the elderly, persons with disabilities, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter."

While the Draft includes a breakdown of the percentage of people with different types of disabilities was provided via U.S. Census data, the census data breaks down disability into only four categories for hearing, vision, independent living, and cognitive. Different types of disabilities require different types of accommodations and modifications in housing, and the residents of the City of Stockton have various combinations of disability, all with their own unique combination of resultant functional limitations possibly needing housing accommodations. Without planning explicitly for accessibility of all kinds, disabled Stocktonians will not have adequate homes to live in. This Draft does not do so and therefore fails to account for every economic segment of the community and is contrary to the duty to AFFH.

The City spends a fair amount of effort discussing people with Intellectual and Developmental Disabilities, which DRC appreciates. The City's Draft also states that "according to the California Department of Developmental Services, as of April 2022, the Valley Mountain Regional Center served 16,443 residents with developmental disabilities in the region and 5,387 residents in Stockton… A significant number of developmentally disabled Stockton residents receiving services from the Valley Mountain Regional Center lived in group home facilities (10.2 percent of adults). Most developmentally disabled individuals lived "at home" (76.8 percent)."

However, the word "at home" is misleading here as what this truly means is that 76.8% live "at home" with their families. Most of these families include aging

Commented [MD17]: The city has added quantifiable objectives to certain programs. While the city welcomes additional use of existing and new programs, as some of these programs rely on a third party for success (outside funding sources, residential loans for purchase/remodel, etc.) some of the success is contingent on the activity of those third parties. While the proposed policies comply with providing quantifiable objectives, the plan cannot force third parties act upon the quantifiable objectives.

Commented [MD18]: City staff will discuss this with the state for compliance with special housing needs requirements.

Commented [MD19]: The City is confident that the element complies with state law regarding the state-required "special housing needs" and "AFFH" requirements. The City is open to exploring various types of subgroups beyond what is required by state law and the census.

parents from the baby boomer generation with children with I/DD, putting those children at risk of homelessness when their family members pass, as their SSI is not sufficient to afford market rate housing. And because they have been living with family, they will not have any other benefits established. Indeed, the City acknowledges in its Draft that "many persons with disabilities rely solely on Social Security Income, which is insufficient for market rate housing." Draft at BR-32. A significant portion of this 76.8% of those being served by the Regional Center could live independently, but for any affordable, accessible, safe, inclusive and non-segregated housing options.[16]

In addition, per the City's own data, a rather shocking statistic coming out of U.S. Census shows that in Stockton, among school age children, nearly half (48.6 percent) have a "cognitive impairment." For persons with disabilities ages 18 to 64 years, 27.4 percent have trouble walking, 23.2 percent have cognitive impairments, and 20.8 percent have difficulty with independent living.

Many people with mental health disabilities require supportive services to maintain stable housing. The City should separately analyze the housing needs of people with mental health disabilities and create programs to specifically address those needs. Those needs include: supportive housing, crisis housing, shared housing, and other innovative housing models. Without addressing this issue, people too often cycle between houselessness and institutionalization.

Further, there is no discussion of the unique needs of Blind residents, or those of Deaf residents.

In addition, the City should recognize that people who are homeless are by definition people with disabilities for their analysis of special populations. Those who are formerly incarcerated face incredible barriers to housing in Stockton as they face criminal background checks for rental housing, credit checks. and a myriad of other barriers. People who are formerly incarcerated are mostly people of color and people with disabilities and Stockton's Housing Element Draft does not account for the housing needs of this special population. As such, it is also not AFFH.

The Draft states, "[t]he unhoused are a fair housing concern, and it is often difficult to collect informative data that accurately reflects the magnitude of the

Commented [MD20]: The City is confident that the element complies with state law regarding the state-required "special housing needs" and "AFFH" requirements. The City is open to exploring various types of subgroups beyond what is required by state law and the census.

Commented [MD21]: This is included in the proposed element.

Commented [MD22]: The City welcomes the chance to speak with the DRC about how we can provide more services to different population groups. Whether in the Housing Action Plan or other effort.

[16] Two reports attempt to assess the housing needs of people with intellectual/developmental disabilities, despite a dearth of accurate data: https://scdd.ca.gov/wp-content/uploads/sites/33/2018/12/STATEWIDE-STRATEGIC-FRAMEWORK-FOR-EXPANDING-HOUSING-OPPORTUNITIES-FOR-PEOPLE-WITH-INTELLECTUAL-AND-DEVELOPMENTAL-DISABILITIES-10.16.pdf and

population at risk, resulting in undercounting." The data source the City uses is a Point-in-Time count led by the San Joaquin County Community Development Department and the Central Valley Low Income Housing Corporation in late January 2022. The City estimates it has "921 persons without nighttime shelter as of the 2022 Point-in-Time (PIT) Count. The size of shelters in Stockton is based on building and fire code allowances and there is no maximum number of beds." The City's analysis is as follows:

> Government Code Section 65583(a)(4)(I) requires a minimum of 200 square feet per person to meet the unsheltered need. To address the unsheltered needs of 921 people, this would be a minimum of 184,200 square feet or 4.2 acres. The 21 vacant parcels in the IL, IG, and PF districts range in size from 0.11 to 5.11 acres. Therefore, there are sufficient sites in the city to address the potential need for emergency shelters to accommodate 921 unsheltered persons experiencing homelessness.

However, the total number of homeless people living in the City is admitted to be undercounted. According to Community Based Organizations working with homeless in the many encampments in Stockton, the number is closer to 5,000 people who may need emergency shelter on any given night. Additionally, Stocktonians experienced extreme flooding and heat waves in 2022 which have resulted in increased homelessness. The City states in the draft that "[wh]ile the results suggest there has been an increase in the number of unsheltered homeless, the increase may also be a result of a more complete and rigorous unsheltered count." However, DRC participated in the 2022 Point-in-Time Count and observed various issues with the City's methodology for counting people experiencing homelessness in the City. The City chose to allot only one day to conduct a PIT count for Stockton—the largest city in San Joaquin County, and conducted the entire count for approximately no more than six hours total. Further, even if a person had no home or a regular place to sleep, the City instructed volunteers not to count someone as experiencing homelessness if they had not slept on the street the night before the PIT count. This approach and methodology surely resulted in a low count. Inaccurate counts of those experiencing homelessness stand to hamper the City's efforts to end homelessness and likely decrease the ability to get appropriate funding from state, federal, and philanthropic sources. Data from, for example, the school district, could help supplement the PIT data to create a fuller picture of the number of unhoused in Stockton.

Commented [MD23]: These numbers are based on local projections provided by our regional partners. The city will continue to monitor these counts as they are updated by our qualified providers.

Commented [MD24]: The City will continue to explore the best practices for homeless counts and funding options.

The City must also make diligent efforts to evaluate the level to which its shelters and transitional housing present barriers for people with disabilities. For instance, many people with disabilities cannot access housing without reasonable accommodations (e.g. emotional support animals or other policy changes to strict rules) or reasonable modifications (e.g. grab bars installed or other physical accessibility changes). In our outreach to unhoused community members, we have encountered many who cannot access congregate settings like shelters or transitional housing in Stockton due to lack of accommodations for their disability, or because a shelter environment just cannot work for them (e.g. people with significant mental health conditions, or people with autoimmune diseases).

In our work, we often hear from municipalities that they have put policies in place to account for the needs of people with disabilities, and that they expect their contractors and employees to follow those policies and the relevant laws. However, in our experience, such an approach is not enough to actively prevent harm to people with disabilities. There must be a proactive and continued effort made to assess barriers, implement a plan to address identified barriers, and ongoing training and technical assistance. Without these additional steps, we have found that many people with disabilities will continue to be locked out of suitable shelter and/or housing opportunities, thus continuing the homelessness cycle. The difficult truth is that for some people, living on the streets feels better for them and their disabilities than residing in a shelter or transitional housing environment. The shared goal for us all is to ensure that people are not made to feel this way. And, lastly, the City's numbers must include people who are not technically homeless, but who cycle through homelessness and institutions regularly, such as those with mental health disabilities, and formerly incarcerated populations.

III. Programs

Overall, DRC is pleased with the City's goals to create more housing for all income levels and for special populations. However, the quantified objectives articulated for each program do not match the actual needs according to the City's own analysis and data. As an overall comment, policies refer to a Housing Action Plan (e.g. Goal HE-1 and Policy HE1.13, Program), but the policies guiding that plan are not incorporated into this Housing Element, and should be included in the Draft to ensure that they are consistent.

A. Program 15. Development Code Revisions

Commented [MD25]: City staff agrees that the Housing Element must be consistent with the Housing Action Plan and the Neighborhood Action Plans in progress; however, the action plans are implementing tools that will make additional recommendations for action beyond what is required as part of the housing element. The Housing Element Goals, Policies, and Programs have been revised to reflect this consistency and be the foundation for future recommendations discussed in action plans.

Currently the zoning code defines supportive housing in Municipal Code section 16.240.020 and indicates that it is a permitted use by right in special purposes or commercial zones. The zoning code must be amended to allow supportive housing by right in all zones where multi-family and mixed uses are permitted. Government Code section 65583(c)(3). This is in addition to the requirement that transitional housing and supportive housing shall be considered a residential use subject only to the same restrictions that apply to other residential units of the same type in the same zone. *Id*.

Commented [GU26]: City is already in compliance with this law. This is discussed in the Potential Housing Constraints section.

B. Program 21. Code Enforcement Program

This program states the City shall continue to inspect housing units in "targeted areas" to check for building code violations. In situations where properties cannot be rehabilitated, the City will "continue to enforce the removal and replacement of substandard units." Here, 2,000 units annually is the quantifiable objective and completed via the "Police Department: Neighborhood Services Division", which houses code enforcement. DRC actively engages in frequent, ongoing conversations with Stocktonians who are unhoused, renting, people of color, and people with disabilities. Conditions of the current housing stock in Stockton are a major concern.

To better address this major concern, we recommend that the City commit to moving from a complaint-based code enforcement system to a proactive one, and one that includes tenant protections to prevent displacement (see displacement discussion above). This could include creating a rent escrow account program as well as engaging in proactive inspection. We can provide sample programs if needed.

Concerningly, Policy 4.4, which cross-references Program 21, states that the City will continue to implement a Crime Free Multi-Family Housing Program. *HCD's AB 686 Guidance* explicitly recognizes such programs as barriers to AFFH. Such programs most often serve to discriminate against Black and Latinx households, disabled people, and domestic violence survivors.[17] The City should identify this program as a barrier to AFFH and create a program to remove it. Similarly, given the barriers to reentry faced by people leaving institutions

Commented [MD27]: The City will coordinate with the State to assess if the program is a barrier under current housing law.

[17] See Liam Dillon, Ben Poston, Julia Barrajas, Black and Latino renters face eviction, exclusion amid police crackdowns in California, Los Angeles Times, November 19, 2020, available at https://www.latimes.com/homeless-housing/story/2020-11-19/california-housing-policies-hurt-black-latino-renters; See also, e.g. Alisha Jarwala & Sejal Singh, When Disability is a "Nuisance": How Chronic Nuisance Ordinances Push Residents with Disabilities Out of Their Homes, Harvard Civil Rights-Civil Liberties Law Review, Vol. 54, Page 875, available at https://harvardcrcl.org/wp-content/uploads/sites/10/2019/07/54.2-Jarwala-Singh.pdf

including jail and prison, Code Enforcement should not be housed in the City's Police Department, so as to ensure that residents can work proactively with Code Enforcement.

C. Program 24. Continue to Assist the Disabled in Community Development Block Grant Project Areas.

DRC is pleased with Program 24: The City shall continue to include special provisions for housing the disabled in CDBG project areas, including mobility grants for homes (e.g., Emergency Repair Program) and accessibility features for 120 low-income individuals and households in Stockton, including rental units for owners of 4 or fewer rental units. Will the program be available to renters? If not, the City should identify funds to expand the program to renters who need modifications to make their unit accessible. This would also allow older adults to age in place.

D. Program 25. Universal Design

We support the City's Program 25, but note that while universal housing design is an important, the Housing Element should be clear that universal design is not synonymous with full accessibility; the needs, goals, and programs should clarify that the City will encourage both. The City should inventory the amount of its housing stock that is accessible and affordable to people with vision and/or mobility impairments. If the City cannot track these, it should include a program to monitor and track such units, and to make such information available to the public. The City should also make its list of affordable units available to the public. As part of this program, the City should include enforcement of existing accessibility standards. Local governments can affirmatively further fair housing by ensuring that Code Enforcement staff understand accessibility standards and are enforcing those laws.

Commented [MD28]: City staff is working on conducting a housing condition survey and monitoring the housing capacity sites but is not sure how a list like this would be implemented as there are a variety of factors that go into a residential unit being deemed ADA accessible in general. More feedback from groups like the DRC is needed for future discussion.

E. Program 27. Addressing the Needs of Those with Disabilities

As outlined above, Stockton is home to a large number of people with disabilities, including low-income people of color with disabilities. However, the City's programs address only a small portion of their housing needs. After the City identifies the needs of people with mental health and sensory disabilities, in addition to mobility and I/DD, it should include specific information on how to address their needs in this program.

a. Intellectual/Developmental Disabilities

The City says is will continue to work with the Valley Mountain Regional Center to implement an outreach program that informs families in the city about housing and services available for persons with developmental disabilities. However, the "quantified objectives" for this program are described as "N/A." Draft pg. HE-17. This is unacceptable. Senate Bill 812 mandates a discussion of potential housing resources for people with I/DD and this is absent from the Draft.

People living with a developmental disability can live in various types of housing, and often face a lack of truly integrated, community-based options. Such options include:

- Rent-subsidized affordable housing, with services if necessary, accessible, close to transit and community[18]
- Section 8 Apartment/Housing Choice Voucher with housing navigation supports. Few regional centers contract with housing navigators – but people with specialized training to help place individuals in housing can be critical.

Commented [GU29]: This information has been used to update the section on those with Developmental Disabilities in the Existing Needs Assessment section.

The City should also ensure that the Housing Authority is complying with the obligation to exclude IHSS income of family members serving as caregivers when it calculates household income. Overall, individuals with I/DD should have choice to live in the most integrated, non-segregated settings possible. Only when absolutely necessary, the following may also be appropriate: Licensed and unlicensed Single Family homes, modified, of 3-5 bedrooms, or housing specially modified for the Medically Fragile (SB 962 Homes)

b. Reasonable Accommodation Ordinance

We appreciate that the City will amend Chapter 16.214 of its Municipal Code, pertaining to reasonable accommodations. We support that Program 27 proposes to remove two of the findings that are part of the City's Reasonable Accommodation approval process for consistency with State law: (1) whether the requested reasonable accommodation adequately considers the physical attributes of the property and structures, and (2) whether alternative reasonable accommodations could provide an equivalent level of benefit. DRC would like to state this change should be made immediately. However, additional changes are needed to bring the ordinance into compliance with state law. We urge the program include a commitment to make the following changes:

Commented [GU30]: These items have been added to Program 27 in the Policy Document

[18] For an example of integrated, disability-forward housing models for people with I/DD, see https://thekelsey.org/.

- Section 16.214.030 Definitions: "'Individual with a disability'" means any person who has a medical condition, physical disability, or mental disability that substantially limits one (1) or more of the person's major life activities, as those terms are defined in the Acts." The City's definition here aligns with the federal, but not the state definition of disability. To comply with Government Code § Gov. Code §12926.1(c), the City must strike the word "substantially". The City should also include complete definition of disability: The Act protects any of the following: an individual with a physical or mental impairment that limits one or more major life activities; anyone who is regarded as having any such impairment; or anyone who has a record of having such an impairment.
  Individuals in recovery from drug or alcohol abuse are protected by federal and state fair housing laws. However, individuals currently using illegal substances are not protected under the law, unless they have a separate disability.
- The protections afforded people with disabilities under federal and state fair housing laws extend to those who are associated with them, including providers and developers of housing for people with disabilities.
- Section 16.214.060 Application Filing: A provision should be made to ensure confidentiality of the person with a disability's contact and medical information. Further, this section should make clear that not only may a person with a disability file an application, but also an organization serving people with disabilities (e.g. sober living homes, transitional or supportive housing for people with disabilities, etc.)
- Section 16.214.070 Review and Processing: Reasonable accommodation requests do not require that the City notify neighbors of the request. Such notification will in most circumstances, invade the applicant's privacy rights, or possibly result in discriminatory or not-in-my-backyard behavior. This requirement should be removed, both to ensure meaningful access to the City's land use and zoning programs under the ADA and to affirmatively further fair housing under AB 686 and the Fair Housing Act.
- Section 16.214.080 Findings and Decision: We recommend that the City add a clause making clear that if the request is denied because it would impose an undue financial and administrative burden on the County and/or would require a fundamental alteration to the zoning or building laws, policies or procedures of the County, the Director or their designee must engage in an interactive process with the person seeking the accommodation to determine if there is another reasonable accommodation that may provide an equivalent level of benefit.

Commented [MD31]: As indicated in the proposed programs, updates to the reasonable accommodations standards are already underway and are anticipated to be completed with the development code update in early 2024.

- Section 16.214.090 Appeals: We recommend that appeals are directed to the City Manager in consultation with the ADA Coordinator, in order to ensure confidentiality.

F. Program 23. Continue to Support Organizations Assisting Homeless Persons

Program 23 seeks to increase shelter and transitional facilities and provide short term financial assistance for households at risk of becoming homeless, however, exactly how this would work is not defined. Program 23 states:

> "The City shall annually apply for and continue to pursue State and federal funds available to the City, private donations, and volunteer assistance to support homeless shelters. The City shall continue to provide financial assistance from its Emergency Solutions Grant (ESG) funding to homeless service providers and continue to support additional development of shelter facilities *as requested by shelter providers*. In addition, the City shall review the need for additional shelter facilities and services when it updates its Consolidated Plan." [emphasis added]

First, under the Housing Element, the City must plan for all economic segments of the community and that includes those with little to zero income; it includes homeless people. So, to say the City will "support" additional development of shelter facilities, but only "as requested by shelter providers," is not a proper metric to AFFH or substantiate a meaningful program to address the actual needs findings. Further, in order to end homelessness, emergency shelters and even transitional housing cannot continue to be the City's primary mode of addressing the issue.

Under Program 23, the City aims to assist up to 2,000 unduplicated homeless persons; and 1,000 households at-risk of homelessness with limited-term rental assistance or utility payments. As part of this, the City will increase the number of board and care or other types of residential or transitional care facilities for vulnerable populations by 300-500 beds. DRC opposes increasing the use of institutional-type settings to house people, which often includes board and cares. Through our role as the state's Protection and Advocacy agency, we hear about such institutional conditions from clients and stakeholders. Housing options should be community-based, allow for freedom to come and go, and not have onerous rules.

G. Additional Program Recommendations

As explained above, the City's AFFH analysis indicates that programs are needed in the following areas: tenant protections to mitigate displacement, environmental justice, and programs to increase opportunities to preserve affordability via innovating community ownership models.

The City's Housing Element programs do not address tenant protections – which are critical to ensuring that existing residents can continue to live in their homes. Moreover, community members have identified such protections as a major issue. For example, the Stockton Housing Justice Coalition held an event on May 3, 2020 in which a tenant bill of rights, right to counsel, strong just cause protections, and universal income for renters were indicated as needed policies. Further, ending tenant harassment and discrimination as well as rent stabilization policies are also critical to mitigating displacement. We urge the City to include a tenant protection program committing to the creation of such policies.

With regard to environmental justice, the City should both ensure a dispersal of sites so that neighborhoods with the highest pollution burdens are not the location of most future building, while also creating a remediation program to seek funding for site remediation. The City should also include EJ policies that specifically address the needs of the elderly, people with disabilities, and people with chronic respiratory conditions including establishing a program to distribute air conditioning to these vulnerable populations. For example, the City could identify sources of funds that prioritize elderly residents and residents with disabilities access to in-home HEPA air filters at little or no costs. Furthermore, the City should explore an EJ policy, similar to Los Angeles County's Green Zones Ordinance, to create air pollution buffers to prevent the future zoning of residences, schools, childcare facilities, elderly care facilities, parks, and health care facilities away from heavy industrial areas.

Commented [MD32]: The City will explore additional performance standards with the Development Code update in 2023.

In addition to these recommendations, community members have identified others that the City should consider. For example, at the May 3, 2020, Stockton Housing Justice Coalition community meeting, City residents suggested: a renters' right to counsel; adoption of a tenants' bill of rights; repurposing vacant buildings, e.g., those downtown, for affordable housing; the City's acquisition of land for development of lower income housing; extending just cause eviction protections to single family homes; and universal basic income for renters. These are all appropriate and valid program considerations for the housing element that would also affirmatively further fair housing.

Commented [GU33]: Revisions have been made to Program 28 in the Policy Document to address this comment

Increasingly, jurisdictions are creating programs to preserve affordability through community-based models such as promoting community land trusts, developing tenant opportunity to purchase ordinances, and land banking. We urge Stockton to do the same in order to create long-term community-led affordability.

IV. Conclusion

DRC submits these initial comments and recommendations, but plans to supplement these in the coming weeks. Please reach out to DRC at (619)814-8501 if we can be of any assistance as the Planning Department considers these recommendations and comments.

Thanks,



Nichole Mendoza
Senior Attorney
Civil Rights Practice Group
Disability Rights California

Attachment A

Stockton 6th Cycle Housing Element

Bailey Schweitzer, Weiyang Tang, Joann Martinez

Table of contents

1. Overview of Stockton
2. Stockton's Housing Element Timeline & RHNA Allocation
3. Alleviating Patterns of Racial and Income Segregation
4. Overlapping RHNA Inventory and Polluted Neighborhoods
5. Commercial Zoning
6. Summary
7. Recommendations

Overview of Stockton, CA

- Medium-sized city of 322,000
- Located in the Central Valley, 80mi east of Berkeley
- Racially diverse - plurality Latinx
- Median HH income of $58,393

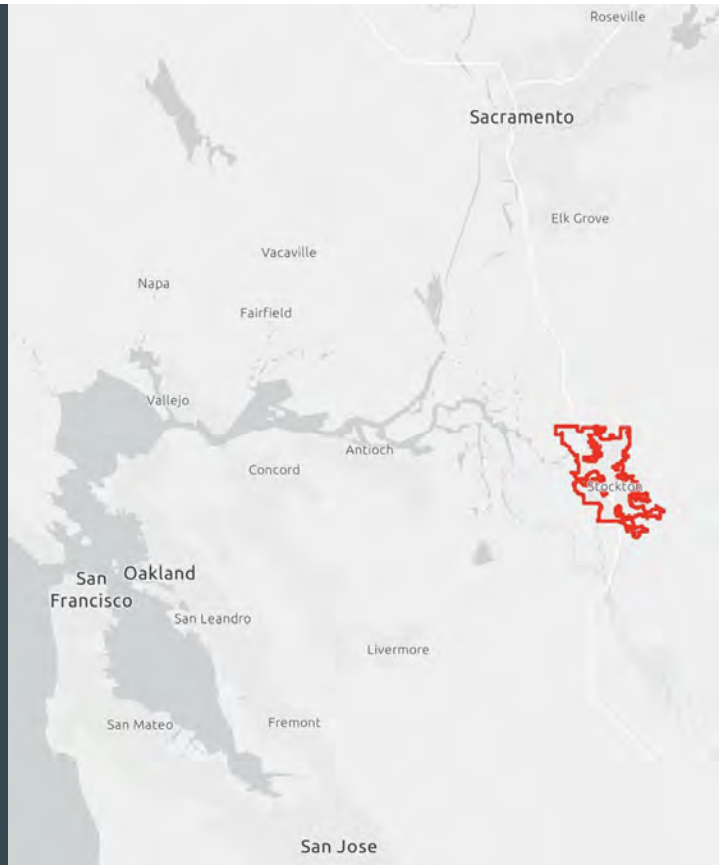


Exhibit 1- 2023-2031 Housing Element

Housing Market Conditions

- 50% owner-occupied
- 72% single family
- Despite a significantly more affordable housing market than CA, it has similar levels of housing burden



Exhibit 1- 2023-2031 Housing Element

Stockton's 6th Cycle Housing Element Timeline

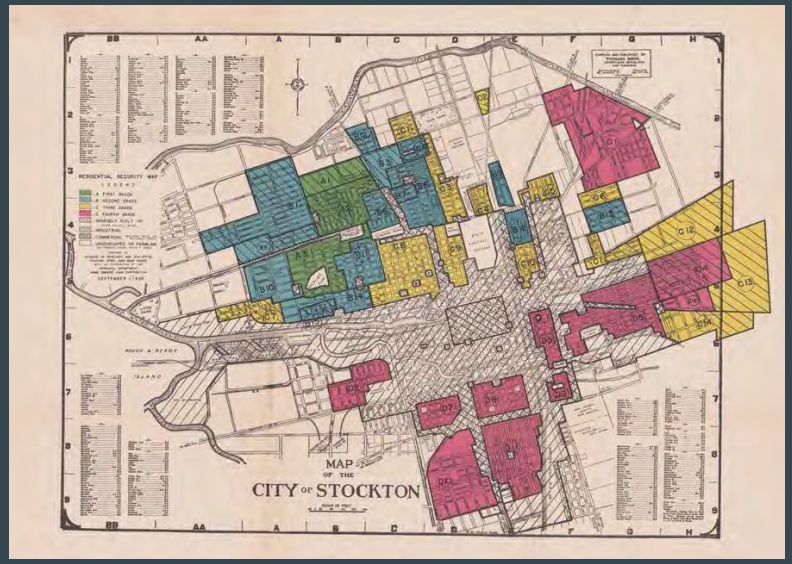
- Stockton's 6th Cycle Housing Element isn't due to HCD until December 2023
- As of December 2022, they released a preliminary map of RHNA sites
- Focused on advising the city on how to create a compliant housing element that affirmatively furthers fair housing per AB 686

Draft Housing Element Sites Inventory

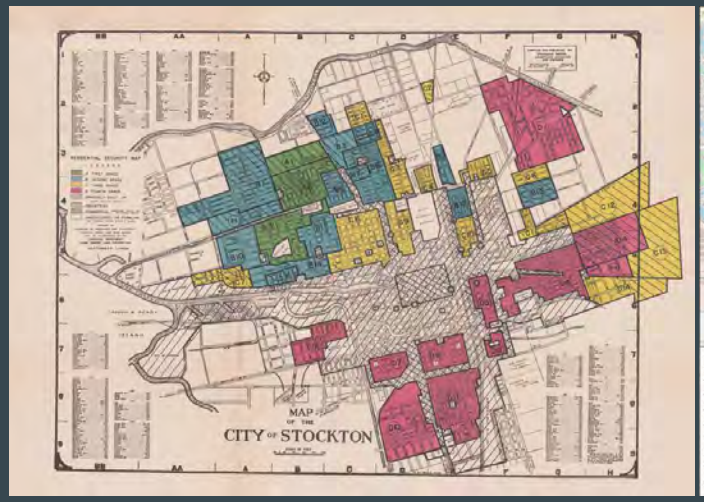
Income Group	RHNA	Entitled Projects	Sites*	Total Capacity	Surplus
Lower Income (<80% AMI)	4,013	0	5,273	5,273	1,260
Moderate Income (81%-120% of Median Income)	2,587	2,050	2,193	4,243	1,656
Above Moderate Income (>120% of Median Income)	6,072	11,620	2,177	13,797	7,725
TOTAL	12,672	13,670	9,643	23,313	10,641

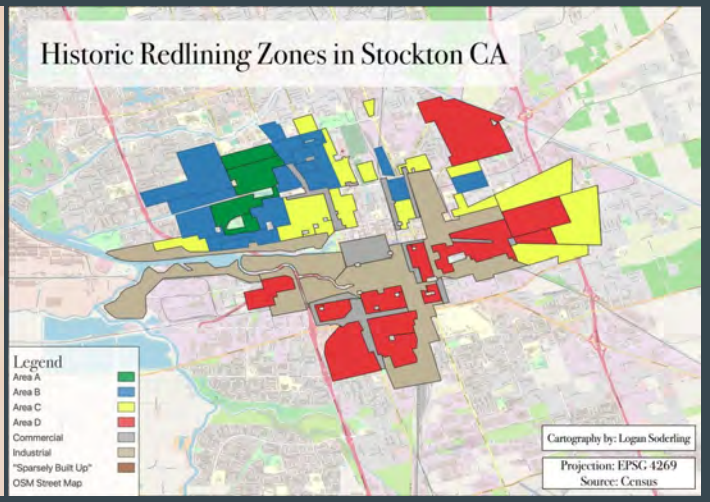
*573 acres

Alleviating Patterns of Racial and Income Segregation

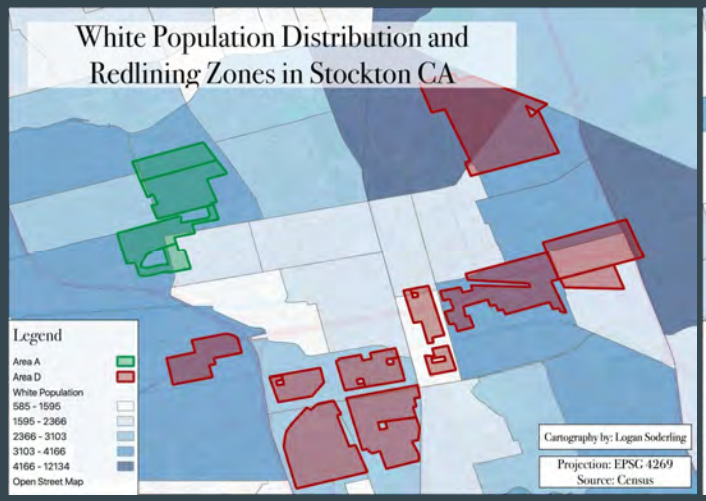


Alleviating Patterns of Racial and Income Segregation

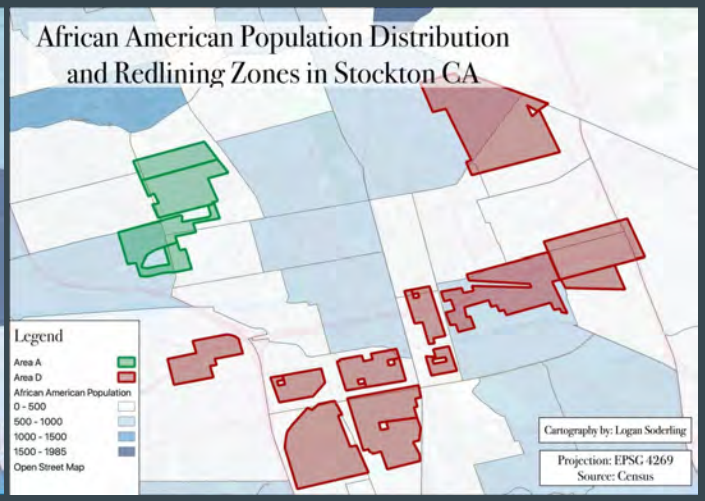




Redlining Archives of California's Exclusionary Spaces:

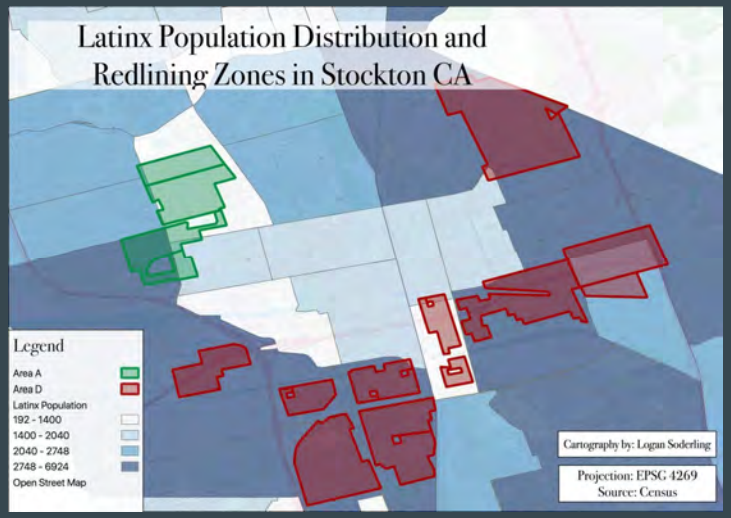


White Pop. and Redlining



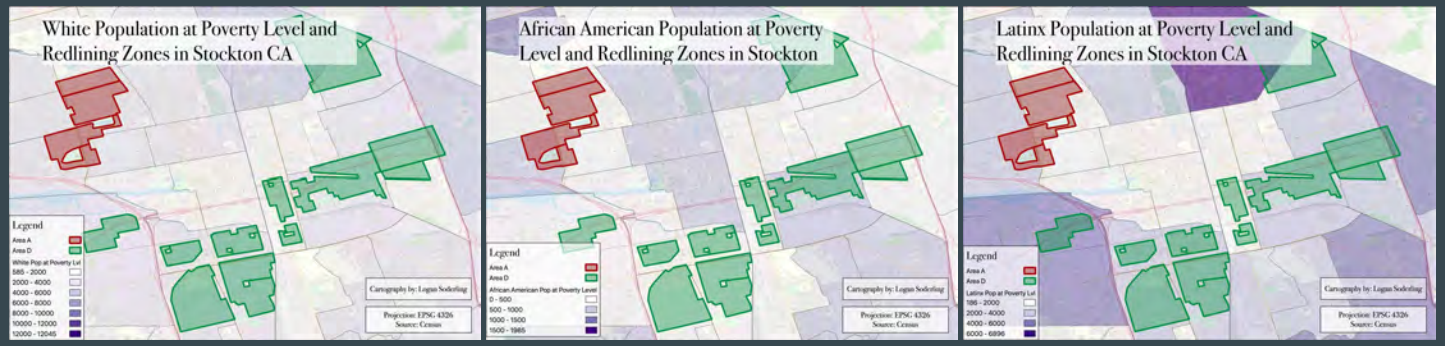
African American Pop. and Redlining

Redlining Archives of California's Exclusionary Spaces:



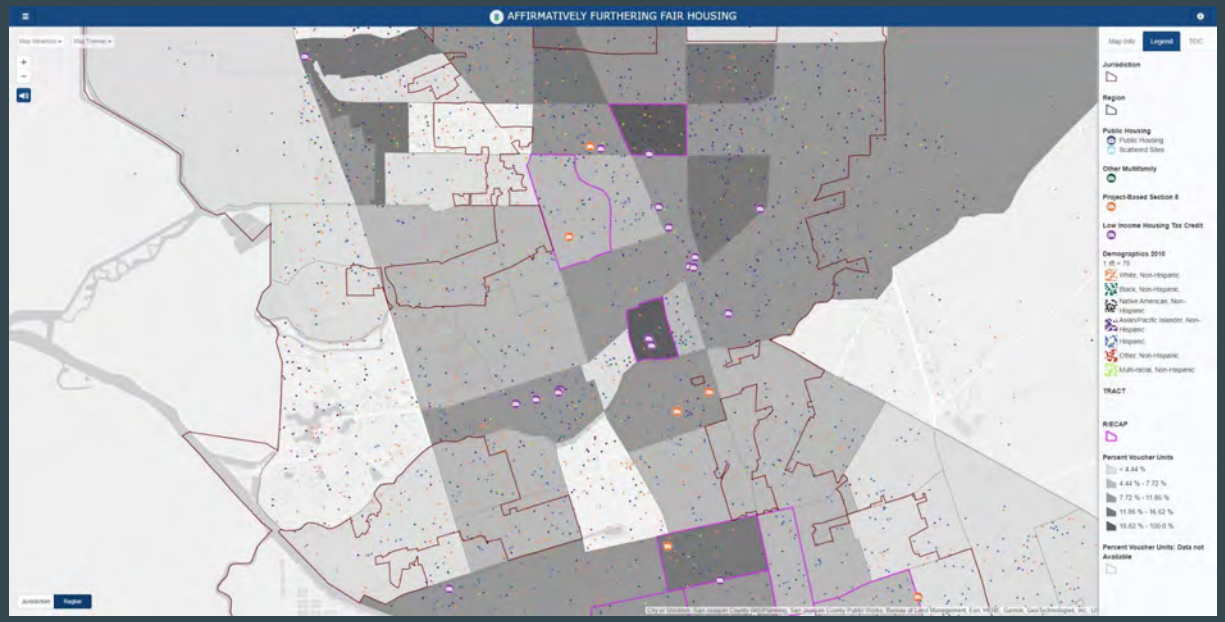
Latino Pop. and Redlining

Redlining Archives of California's Exclusionary Spaces:



Race Poverty and Redlining

AFFH Data From HUD



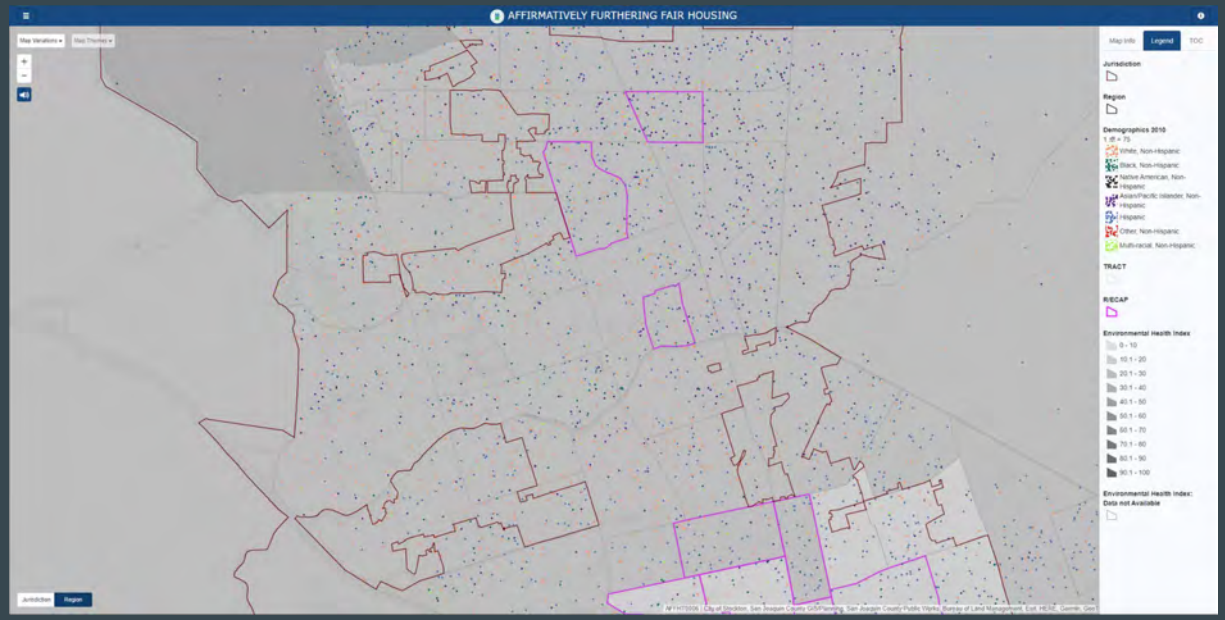
Publicly Supported Housing and Race/Ethnicity

AFFH Data From HUD



Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

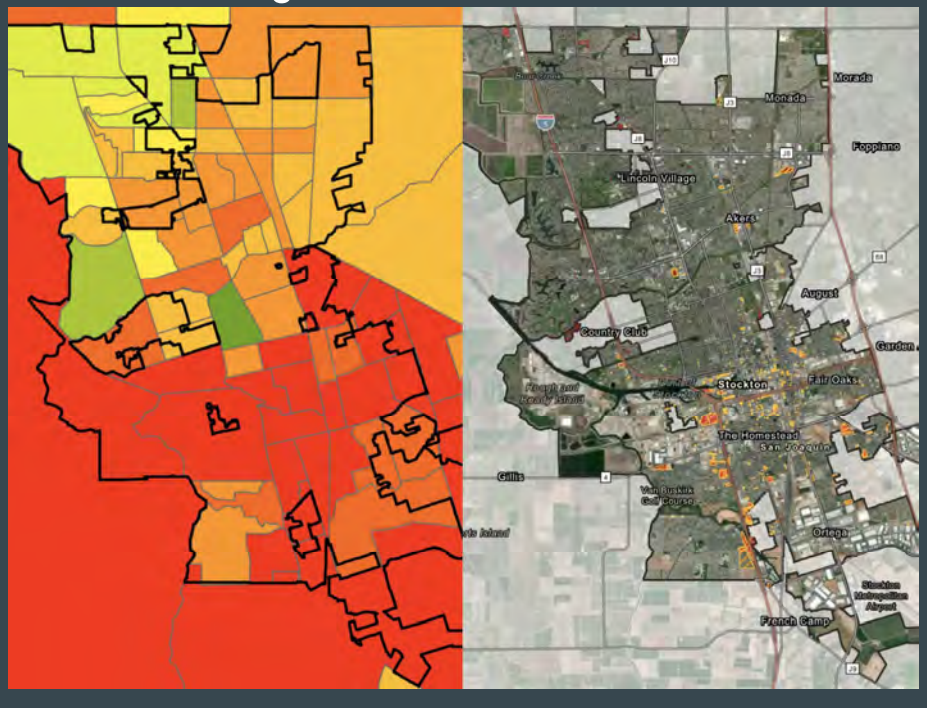
AFFH Data From HUD



Demographics and Environmental Health

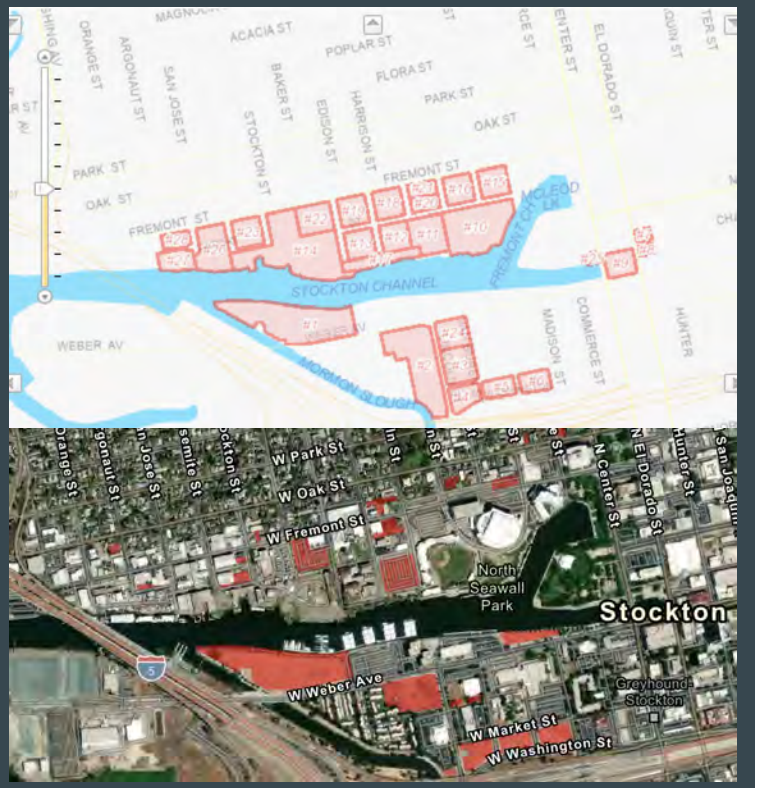
RHNA Site Selection and Polluted Neighborhoods

- Most sites are located in neighborhoods CalEnviroScreen 4.0 considers heavily polluted and highly disadvantaged
- Unclear number of units they expect for selected sites



Stockton Brownfields

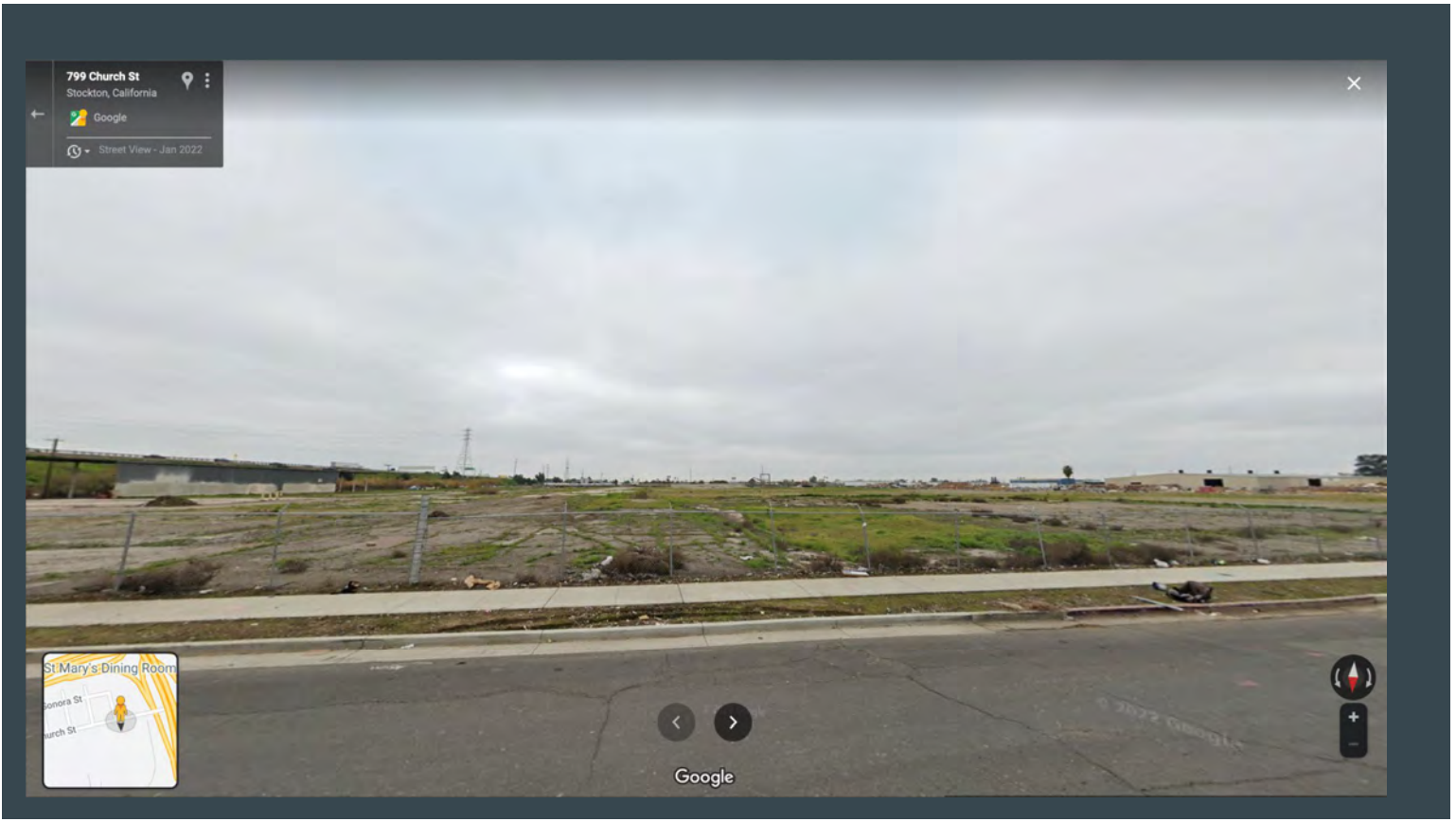
- EPA awarded Stockton a $600,000 Brownfield Assessment Grant
- City appropriated funds through September 2021
- Conducted an assessment of redeveloping the industrial waterfront
- City is actively recruiting developers
    - Local financial assistance is unclear



Example Site: Overlapping Clean-up and RHNA Inventory Site

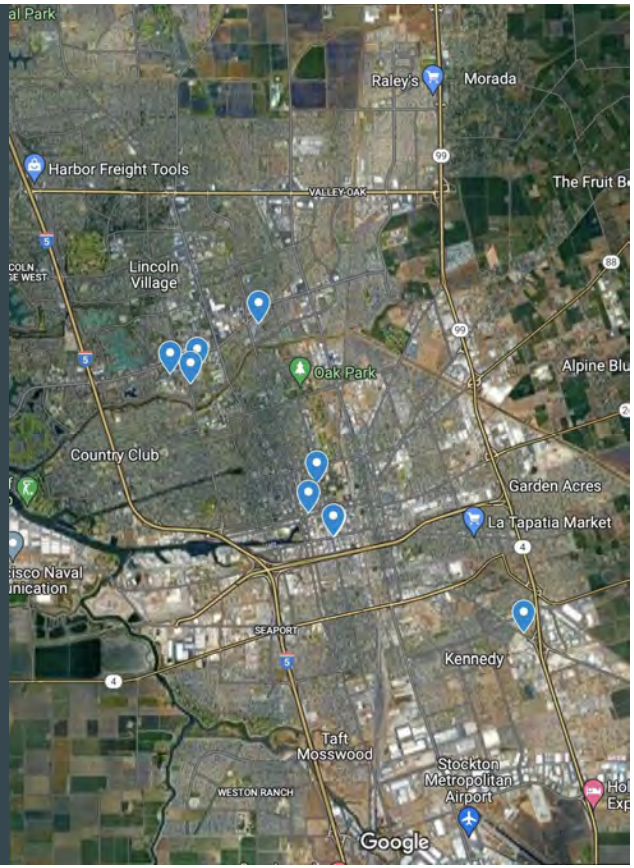
- 39.72 acres
- Overlaps clean-up site
- Surrounded on all sides by highways and rail
- Located adjacent to the I5 and highway 4 interchange and abuts rail
- Development unlikely without local financial assistance




799 Church St
Stockton, California
Google
Street View - Jan 2022
St Mary's Dining Room
Google

5th Cycle Housing Element Deed Restricted Affordable Housing

- Constructed and approved deed restricted affordable housing between January 2014 and December 2023
- Sites are located across the city in less polluted areas
- Promising for 6th cycle



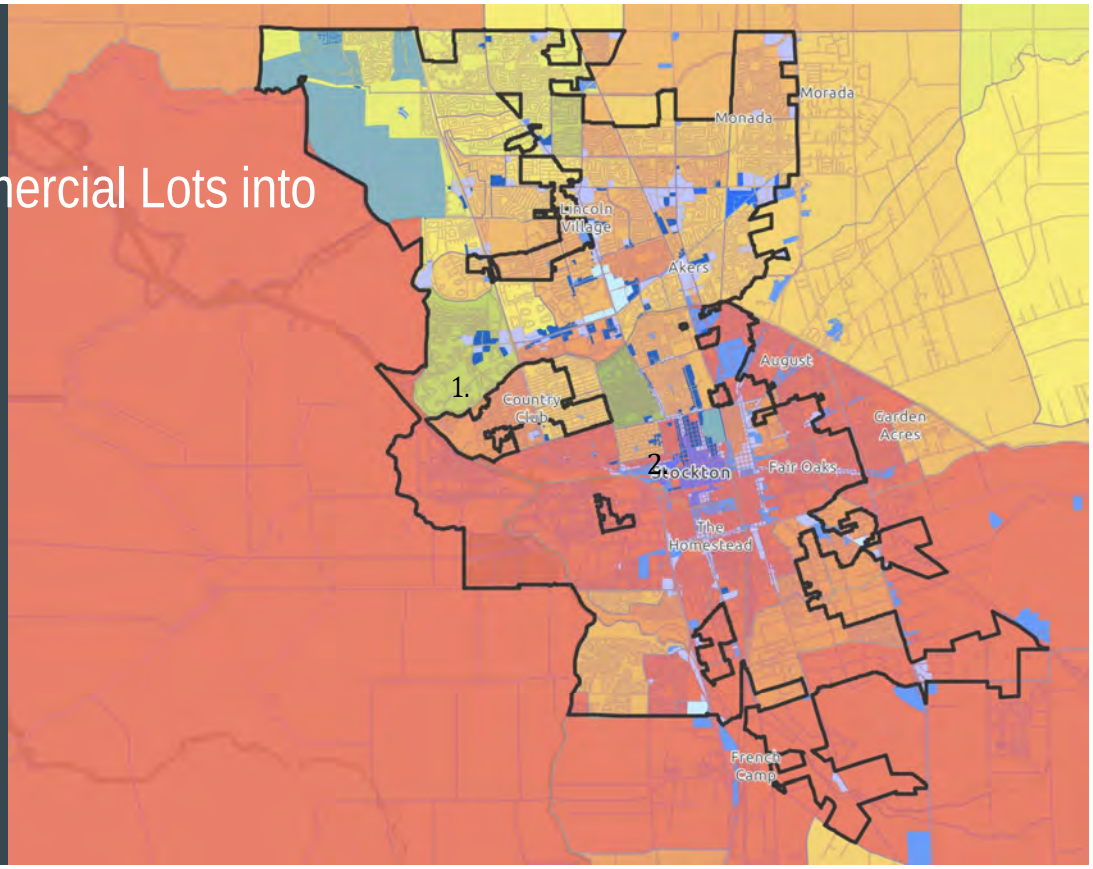
Incorporate Commercial Lots into RHNA Inventory

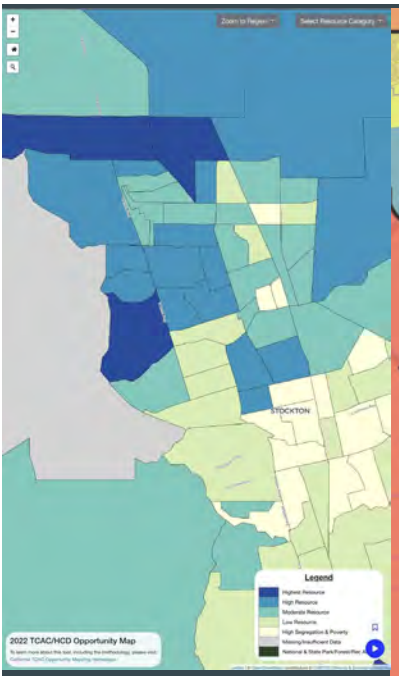
Case Study Area 1:

Brookside March Lane

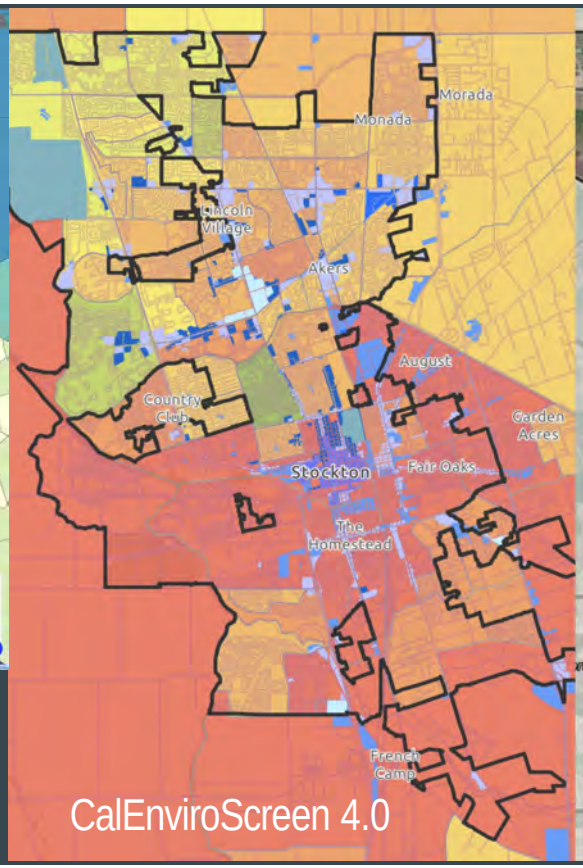
Case Study Area 2:

Miracle Mile





2022 TCAC/HCD Opportunity Map



CalEnviroScreen 4.0



Stockton RHNA

Case Study Area 1: Brookside March Lane

3404 Shadowbrook Dr.

APN 11628002

Acres 1.20; Sq. Ft. 52,008.99



Case Study Area 2: Miracle Mile

A.

1828 Pacific Ave

APN 13702042

Acres 0.69 Sq. Ft. 30,795.91

B.

2402 PACIFIC AV

APN 12506001

Acres 0.13 Sq. Ft. 6,073.93



Summary

- Far too soon to tell what Stockton's housing element will look like
- Stockton will have met its moderate and high-income RHNA allocation through entitled projects
- Redlining has lasting implications
- Sites concentrated in distressed and high polluted neighborhoods

Recommendations

1) Future stages of site selection must seriously consider high opportunity communities
2) The large site located near downtown should receive local financial assistance if the city wants to actually build there
3) Incorporate environmental justice into housing element

Recommendations

4) Incorporate unpolluted commercial zones, namely Miracle Mile & Brookside March Lane, into element

5) Government should not just focus on investing on North Stockton. South of the crosstown freeway also need some attention.

6) City should stop subsidizing unprofitable public golf courses in north Stockton and put money toward affordable housing fund.

QUESTIONS?

HOUSING

This main element is divided into three sections:

- Introduction to the Policy Document
- Goals and Policies
- Implementation Programs and Quantified Objectives

INTRODUCTION TO THE POLICY DOCUMENT

Under California law, ~~the~~ a housing element must include the community's goals, policies, quantified objectives, and housing programs for the maintenance, improvement, and development of housing.

This Housing Element includes nine goal statements. Under each goal statement are policies that amplify the goal statement. Implementation programs are listed after the policies and briefly describe the proposed action, ~~the~~ City departments with primary responsibility for carrying out the program, ~~the~~ funding source(s), and ~~the~~ time frame for accomplishing the program.

The following definitions describe the nature of the statements of goals, policies, implementation programs, and quantified objectives as they are used in the Housing Element Policy Document:

- **Goal**: Ultimate purpose of an effort stated in a way that is general in nature and immeasurable.
- **Policy**: Specific statement guiding action and implying clear commitment.
- **Implementation Program**: An action, procedure, program, or technique that carries out policy. Implementation programs also specify primary responsibility for carrying out the action and an estimated time frame for its accomplishment. The time frame indicates the fiscal year in which the activity is scheduled to be completed. These time frames are general guidelines and may be adjusted based on City staffing and budgetary considerations.
- **Quantified Objective**: The number of housing units that the City expects to be constructed, conserved, or rehabilitated, or the number of households the City expects will be assisted through Housing Element programs based on available resources and general market conditions during the time frame of the Housing Element. Housing element law recognizes that in developing housing policies and programs, identified housing needs may exceed available resources and the community's ability to satisfy these needs. The quantified objectives of a housing element, therefore, need not be identical to the identified housing need, but should establish the

maximum number of housing units that can be constructed, rehabilitated, and conserved, or households assisted over an eight-year time frame.

GOAL HE-1 AND ASSOCIATED POLICIES

GOAL HE-1: INCREASE HOUSING PRODUCTION AND ENSURE ADEQUATE LAND FOR ALL HOUSING TYPES AND INCOME LEVELS. INCREASE HOUSING PRODUCTION BY ENSURINGE ~~THE~~ ADEQUATE SITES FOR HOUSING OF ALL TYPES AND INCOMES, RECOGNIZING THE IMPORTANCE OF A JOBS-TO-HOUSING RATIO THAT ENCOURAGES LIVING AND WORKING IN OUR COMMUNITY.

Policy HE-1.1 Availability of Land: The City shall maintain sufficient designated and zoned vacant and underutilized sites for housing to achieve a mix of single-family and multifamily development that will accommodate anticipated population growth and the housing needs established in the City's regional housing needs allocation (RHNA) of 12,673 units (1,232 extremely low, 1,233 very low, 1,548 low, 2,572 moderate, 6,088 above moderate). In addition to the Housing Capacity sites needed toward RHNA, the Housing Action Plan (HAP) shall explore additional areas that could potentially support housing. This could include underutilized properties, underutilized buildings, and unincorporated areas. This surplus shall be used to maintain the City's Pro-Housing Designation that~~which~~ requires the City to maintain ~~1~~30-percent surplus over the RHNA requirement. (Programs 1, 2 and 3)

Policy HE-1.2 Avoid Downzoning: The City shall not downzone parcels identified in the Housing Element inventory unless they are replaced concurrently by comparably zoned land elsewhere within the C~~c~~ity, or the City makes the determination that there are still adequate sites in the inventory to meet the remaining regional housing needs allocation. (Program 1)

Policy HE-1.3 Parcel Consolidation: The City shall encourage the splitting or consolidation of parcels to facilitate more effective residential development and continue to process these requests ministerially. (Program 8)

Policy HE-1.4 Infrastructure and Public Facilities to Support Residential Development: The City shall take into consideration where housing is planned or likely to be built when preparing plans for capital improvements to expand or improve infrastructure and public facilities that support new residential development and ensure adequate services. (Program 4)

Policy HE-1.5 Higher Residential Densities: The City shall encourage residential densities at the high end of the allowable density range to make more efficient use of land and public facilities and services, and ~~to provide more affordable housing opportunities for all residents~~expand programs that would allow densities increase beyond the maximum allowable density range for projects that adhere to Housing Element policies. This include the existing 100-percent Density Bonus program and new programs as part of the Development Code Overhaul. (Program 1 and 18)

Policy HE-1.6 Residential Mixed-Use Development: The City shall encourage the development of mixed-use residential-office and residential-retail projects. (Programs 2, 5, and 7)

Policy HE-1.7 Housing Variety: The City shall encourage and provide opportunities for a variety of housing types that provide market-rate and affordable housing opportunities and promote balanced mixed-income neighborhoods. The Development Code Update shall amend zoning to allow more housing variety and higher densities in various residential and commercial zones. (Program 5)

Policy HE-1.8 Accessory Dwelling Units in New and Existing Developments: The City shall encourage the development of accessory dwelling units within new and existing residential development and single-family neighborhoods. (Program 6)

Policy HE-1.9 Infill Development Targets: In an effort to meet the infill target of 4,400 new units in the Greater Downtown Area, the City shall promote infill development within the Downtown and Greater Downtown areas through incentives such as less restrictive height limits, less restrictive setback and parking requirements, subsidies, infrastructure improvements, and streamlined permitting process. (Programs 2 and 7)

Policy HE-1.10 Balanced Growth: The City shall ensure that development at the city's outskirts, particularly residential or mixed-use development, does not occur in a manner that is out of balance with infill development. (Program 7)

Policy HE-1.11 Transit Oriented Development: The City shall encourage higher-density residential uses and mixed-use development to locate near main transportation routes to offer an alternative means of transportation to employment centers, schools, shopping, and recreational facilities and to promote walking and biking. Consistent with the General Plan policies, the City will establish Transit Oriented Development overlays as part of the Development Code Update. (Programs 2, 5 and 7)

Policy HE-1.12 Adaptive Reuse: The City shall encourage the adaptive reuse of existing buildings for residential and mixed use. The HAP shall outline potential reuse sites in the downtown area and explore potential partnerships and resources to retrofit chronically vacant buildings for residential and mixed uses. (Program 2)

Policy HE-1.13 Public/Private Partnerships: The City shall strive to establish public-private partnerships for the revitalization of blighted areas. The HAP shall explore these partnerships and make recommendations on where these partnerships should be achieved to address existing barriers to new housing. (Program 5)

Policy HE-1.14 Pursue State Funding for Infill: The City shall pursue State funding to support infill development in the Downtown and Greater Downtown areas. (Program 7)

Policy HE-1.15 Improve the Downtown Image: The City shall strive to reshape the perception of Downtown Stockton as a livable city center. (Program 2)

Policy HE-1.16 Integrated Affordable Housing: The City shall encourage the integration of sites for affordable housing throughout the residentially designated areas of the city and avoid concentration of low-income housing units. (Programs 5 and 7)

Policy HE-1.17 Mixed Income Housing: The City shall encourage mixed income developments to create more economically diverse neighborhoods. (Programs 5 and 6)

Policy HE-1.18 Facilities and Services: The City shall provide, maintain, and upgrade, as necessary, community facilities and municipal services in support of residential development. (Program 4 and 29)

GOAL HE-1 IMPLEMENTATION PROGRAMS

Program 1. Adequate Sites Monitoring and No Net Loss. As part of the annual progress report on the Housing Element to the State, the City shall update its vacant land inventory, including an updated inventory of potential infill sites (smaller parcels). The City shall make the updated inventory available to the public and development community via the City's website. For any project approval on a Housing Element site for fewer housing units/or at lower densities than assumed in the Housing Element, the City shall determine whether there is still adequate capacity to meet the remaining housing need, consistent with "no net loss" state law.

Quantified Objectives: Continue to maintain sufficient sites to address 12,673 units.

Potential Funding: General Fund

Who Is Responsible: Community Development Department, Economic Development Department

Time Frame: Update inventory annually as part of the Housing Element Annual Progress Report and assess "no net loss" as projects come forward on Housing Element sites.

Program 2. Downtown Implementation: The City shall continue to implement measures to enable development of 4,400 residential units in the Greater Downtown Area by 2035, as laid out in the Climate Action Plan and General Plan. This will include strategies and regulations anticipated as part of the Comprehensive Development Code Update and Housing Action Plan (HAP) currently underway. The HAP shall specifically explore the following topics:

- Sufficient infrastructure capacity and estimated costs for~~to~~ develop all income types and densities.
- Market analysis to explore the opportunities and constraints of new housing in the greater downtown area.
- Cost gap analysis to better understand financial constraints in adaptive reuse of unused commercial buildings in the downtown area.
- Explore existing and potential funding mechanisms for infrastructure and building retrofitting.
- Explore potential partnerships for new housing and supportive services for all income types.

Quantified Objectives: 4,400 residential units in the Greater Downtown Area by 2040.

Potential Funding: General Fund

Who Is Responsible: Community Development Department, Economic Development Department

Time Frame: Adopt Comprehensive Development Code Update and HAP by ~~end of 2023 or~~ early 2024; and annually thereafter to identify any additional strategies to address ~~the settlement agreement~~General Plan goals.

Program 3. Sites Included in Previous Housing Elements: As specified in Appendix A, some vacant parcels have been included in the land inventories of the 5th Cycle~~Round~~ and 4th Cycle~~Round~~ Stockton Housing Elements as suitable to address the City's RHNA allocation. Per Government Code Section 65583.2(c), to continue to include these parcels in that portion of the land inventory for this 6th Cycle~~Round~~ Housing Element, the City will commit to update all required Development Code and General Plan provisions to allow projects that have at least 20 percent affordable units (extremely low, very low, or low) without discretionary review or "by right" (Government Code Section 65583.2 (i)).

Quantified Objectives: 437 residential units on 16 repeat sites identified in Appendix A that don't already allow residential development by right.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Update Development Code and, if needed, Land Use Element by December 31, 2026

Program 4. Public Facilities Repair and Replacement: Through implementation of the HUD Consolidated Plan, and upon funding availability, the City shall continue to identify and target low-income neighborhoods for the expansion of existing facilities/infrastructure, replacement of deteriorating facilities, and construction of new facilities/infrastructure to increase quality of life for Stockton residents. To help identify these neighborhoods and facilities, the City shall update its Housing Conditions survey to better direct staff time and resources in identifying areas and facilities that could benefit the most.

Quantified Objectives: 5 public facility/ infrastructure projects

Potential Funding: CDBG

Who Is Responsible: Economic Development Department, Community Development

Time Frame: Annually

Program 5. Housing and Neighborhood Action Plans: The City is currently preparing a Housing Action Plan (HAP) to provide a guidebook with information to interested developers and property owners about residential opportunities in the city. This plan will include the top priority sites the Ccity has identified as "shovel-ready" for housing development. Selection of the priority sites will be based on financial feasibility analysis and policy goals. The HAP will be marketed and provided to potential developers upon completion. The City is also preparing Neighborhood Action Plans for three (3) neighborhoods - South Airport Way Corridor, Little Manila/Gleason Park, and Cabral/East Cabral. The plans are focusing on eliminating barriers to housing construction and will result in recommended actions and strategies for each of the ~~three~~ Neighborhood Areas. ~~-~~ In particular, the Neighborhood Action Plans for Cabral Station Area and Little Manila/Gleason Park neighborhoods will serve as a tool to improve conditions and opportunities in these two primarily lower-income areas.

Quantified Objectives: Permit 1,000 residential units

Potential Funding: LEAP, REAP, General Fund

Who Is Responsible: Community Development Department

Time Frame: Late 2023

Program 6. Accessory Dwelling Units: The City will update its ADU regulations as needed throughout the planning period to address changes to Sstate law. The City will encourage the construction of ADUs throughout the city through the following actions. These actions~~, which~~ are aimed at providing an increased supply of affordable units and therefore help reduce displacement risk for low-income households resulting from housing overpayment and facilitate mixed-income neighborhoods:

- Provide guidance and educational materials for building ADUs on the City's website, including permitting procedures and construction resources. The City already has preapproved/permit ready ADU plans available for use by homeowners. Additionally, the City will present homeowner associations with information about the community and neighborhood benefits of ADUs and inform them that covenants, conditions, and restrictions (CC&Rs) prohibiting ADUs are contrary to State law.
- Proactively advertise the benefits of ADUs by distributing multilingual informational materials in areas of high opportunity and limited rental opportunities to increase mobility for low-income households. This will be achieved~~,~~ by posting flyers in community gathering places and providing flyers to community groups and homeowners' associations at least annually.
- Monitor ADU production and affordability every other year and adjust or expand the focus of the education and outreach efforts. If needed, identify additional sites to accommodate the unmet portion of the lower-income RHNA.
- Apply annually, or as grants are available, for funding to provide incentives for homeowners to construct ADUs.
- Work with regional and local agencies to update ~~the~~ existing ADU~~s~~ pre-approved construction plans and explore ~~more~~additional plans that reflect the housing market, cost constraints, and typical residential lots that could support them.

Quantified Objectives: Approve 180 ADUs over the course of the planning period, targeting areas of high opportunity, specifically the following neighborhoods - Brookside/Country Club, Weston Ranch, Eight Mile/Bear Creek, Midtown around the University of the Pacific (between I-5 and "Miracle Mile"/Pacific Avenue), western Upper Hammer/Thornton Rd, and eastern Morada/Holman.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Starting in November 2024, evaluate the consistency of Stockton's ADU regulations with Sstate law and update accordingly. Continue to make ADU materials available; evaluate effectiveness of ADU approvals every other year, starting April 2025; and, identify additional site capacity, if needed, by December 2026. Apply annually, or as grants are available, for funding to support ADU incentives.

Program 7. Infill Strategy: The City shall continue to implement the Downtown Infrastructure Infill Incentive Program or explore other financing strategies to facilitate the development of infill projects in the Downtown and Greater Downtown areas. The program identifies actions and incentives to promote infill development, including brownfield remediation. The Housing Action Plan, currently underway, will identify additional recommended strategies that could include:

- Identification of potential infill properties, both vacant and underutilized.
- Explore the practicality and feasibility of pre-approved design review and/or construction plans.
- Increase waivers for development standards that would restrict buildout of a small infill lot. This could include reduced setbacks, height and size increases, and an increase in the amount of waiver by the Community Development Director.
- Density increases allowances for infill projects to exceed the maximum density requirement through an existing 100-percent Density Bonus or through a new process for market rate housing.
- . As needed, Aadditional strategies and incentives will be considered andto plan and fund implemented and could include allowing less restrictive development standards; planning infinfrastructure improvements.
- ; and sWays to further streamliningstreamline the ministerial design review permitting process for infill development.

Quantified Objectives: 100 extremely low incomelow-income units and 150 other lower income units; funding for 10 brownfield sites minimum

Potential Funding: General Fund

Who Is Responsible: Economic Development Department, Community Development Department

Time Frame: Adopt Housing Action Plan by the end of 2023. Implement Housing Action Plan strategies by 2025. Annually, beginning in 2026, identify any additional strategies needed to address overpayment and reduce displacement risk and implement them within 2 years of identification.

Program 8. Infill Site Assembly: The City shall actively work with local property owners and developers to assist in the consolidation and assembly of small infill parcels for residential projects, particularly as related to parcels listed in the sites inventory and parcels with multiple owners. The City shall continue to process lot mergers ministerially and shall offer incentives, such as expedited processing, in addition to the incentives already offered to infill development. The City is updating infill requirements in the Development Code as part of the Comprehensive Development Code Update. The City is also working on mapping potential infill sites that are vacant and ready for development as part of the Housing Action Plan, current underway (see Programs 5 and 15). The City shall also conduct meetings or some other type of public outreach to connect owners of properties with potential developers.

Quantified Objectives: Facilitate lot consolidation to produce sites for 2,300 moderate and above moderate residential units

Potential Funding: General Fund

Who Is Responsible: Economic Development Department

Time Frame: Ongoing, as projects come forward; establish program to connect property owners and developers by June 2026.

GOAL HE-2 AND ASSOCIATED POLICIES

GOAL HE-2: PROVIDE HIGH QUALITY HOUSING FOR ALL INCOME GROUPS. ENCOURAGE AND PROMOTE THE CONSTRUCTION OF AFFORDABLE AND MARKET RATE HOUSING TO MEET CITY'S HOUSING NEEDS AND PROMOTE DEVELOPMENTS THAT CONSERVE ENERGY.

Policy HE-2.1 Pursue Funding: The City shall pursue Ffederal and State housing assistance programs designed to help meet the needs of extremely low-, very low-, low-, and moderate-income households. (Program 10)

Policy HE-2.2 Networking and Collaboration: The City shall continue to collaborate with public agencies and private and nonprofit entities to access State, Ffederal, and other sources of funding to provide housing to lower- and moderate-income households. (Program 9)

Policy HE-2.3 Affordable Housing Incentives: The City shall explore incentives, bonuses, and flexibility in standards and requirements in the Development Code that could benefit affordable housing development, such as density bonuses, flexible development standards, and deferred payment of fees. (Programs 5, 11 and 18)

Policy HE-2.4 Homeownership Opportunities: The City shall continue to provide opportunities for and reduce barriers to homeownership and promote financial literacy and public awareness of the various means available to become a homeowner. (Program 10)

Policy HE-2.5 Priority Sewer and Water Service for Affordable Housing: The City shall provide priority sewer and water service for developments that include lower income housing units, consistent with State law (Government Code Section 65589.7). (Program 11)

Policy HE-2.6 Energy Conservation and Waste Reduction: The City shall promote energy conservation and waste reduction in residential site planning, design, and construction. (Program 12)

Policy HE-2.7 Energy Conservation and Efficiency in City Regulations: The City shall use its review and regulatory power to enhance and expand residential energy conservation and efficiency. (Programs 12, 13, and 14)

Policy HE-2.8 Green Building Concepts: The City shall require green building concepts and processes in new residential construction and rehabilitation of existing housing consistent with State building standards and local subdivision and zoning standards. (Program 12)

Policy HE-2.9 Energy Conservation and Efficiency Programs: The City shall work with local energy providers to promote weatherization and energy conservation programs and incentives to new and existing residential developments, especially low-income households. (Programs 12, 13, and 14)

Policy HE-2.10 Green-Up Stockton: The City shall encourage voluntary residential energy efficiency assessments and retrofits for existing dwelling units. (Program 13)

GOAL HE-2 IMPLEMENTATION PROGRAMS

Program 9. Coordination with the Housing Authority of San Joaquin County: The City shall continue to work closely with the Housing Authority of San Joaquin County in providing assisted housing through the Housing Voucher Program ~~(Section 8)~~, and in providing housing and supportive services to special needs households and individuals. In addition, working with the Housing Authority, implement a Housing Choice Voucher education program to share information about the program and available incentives with rental property owners and managers as well as training on avoiding discriminatory practices based on income or other protected classes. Distribute this information at least annually to property owners and managers across the Cc~~e~~ity, though with an emphasis on higher (moderate, high, and highest) resource areas where there are no public housing opportunities available, a disproportionately low rate of voucher usage, and high performing schools.

Quantified Objectives: Provide vouchers to 3,800 households in Stockton and assist these lower income households in accessing rental opportunities with Housing Choice Vouchers to facilitate housing mobility.

Potential Funding: General Fund

Who Is Responsible: Economic Development Department, Housing Authority of San Joaquin County

Time Frame: Ongoing; establish education program by the end of 2024 and distribute information. Then distribute information at least annually through the end of the planning period.

Program 10. State and Federal Funding: The City shall continue to apply annually for F~~f~~ederal entitlement funds under the CDBG, HOME and ESG Programs, and shall pursue additional State and F~~f~~ederal funding that becomes available during the planning period. The City shall continue to administer its Down Payment Assistance Program for low-income first-time homebuyers using a variety of funding sources, including CDBG and HOME funds. The program will be targeted to those buying in higher opportunity areas. The City shall support housing organizations and affordable housing developers by assisting in applications for funding, drafting letters of support and resolutions, and identifying potential sites for affordable housing. The City shall also discuss the possibility of requiring affordable units as part of development agreements when initiating discussions with applicants.

Quantified Objectives: Fund 200 extremely low-, 400 very low-, 450 low-income units; Provide down payment assistance to 75 low-income households, particularly in high opportunity areas.

Potential Funding: General Fund; CDBG, HOME, HELP, and CalHome

Who Is Responsible: Economic Development Department

Time Frame: Review funding opportunities annually; down payment assistance program is ongoing

Program 11. Priority Sewer and Water Service for Affordable Housing: The City shall include language in the development code to provide priority sewer and water service for developments that include lower income housing units, consistent with State law (Government Code Section 65589.7).

Quantified Objectives: Include in Development Code as part of Comprehensive Update~~N/A~~

Potential Funding: General Fund

Who Is Responsible: City Council, Municipal Utilities Department, Community Development Department

Time Frame: Include in Development Code as part of Comprehensive Update by ~~December 31, 2023~~early 2024

Program 12. Property Assessed Clean Energy (PACE) Program. The City shall continue to provide programs for property owners to finance the purchase and installation of infrastructure improvements to their properties with no up-front costs for: renewable energy, energy- and water-efficiency improvements, water conservation upgrades, and/or electric vehicle charging.

Quantified Objectives: Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs.

Potential Funding: Property Assessed Clean Energy (PACE) financing

Who Is Responsible: Economic Development Department

Time Frame: Ongoing

Program 13. Green-Up Stockton: The City shall continue to encourage voluntary energy assessments for housing units built prior to November 1, 2002. The City shall continue to work with community services agencies and PG&E and other funding sources to identify funding and incentivize residential energy efficiency projects.

Quantified Objectives: Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs.

Potential Funding: General *Fund*

Who Is Responsible: Community Development Department

Time Frame: Ongoing

Program 14. Weatherization Activities: The City shall advertise local weatherization programs by posting information on the City website and distributing fliers and brochures, and shall refer elderly homeowners, low-income households within certain income limits, and the general public to agencies offering weatherization programs.

Quantified Objectives: 200 units weatherized

Potential Funding: Home Energy *Assistance Program HEAP*

Who Is Responsible: Economic Development Department

Time Frame: Ongoing

GOAL HE-3 AND ASSOCIATED POLICIES

GOAL HE-3: REMOVE GOVERNMENTAL CONSTRAINTS. ADDRESS AND, WHERE FEASIBLE, REMOVE UNNECESSARY GOVERNMENTAL CONSTRAINTS TO THE DEVELOPMENT, IMPROVEMENT, AND MAINTENANCE OF STOCKTON'S HOUSING STOCK, AND ENCOURAGE HIGHER-DENSITY DEVELOPMENT.

Policy HE-3.1 Mitigate Governmental Constraints: The City shall strive to mitigate local governmental constraints to the development, improvement, and maintenance of housing. (Programs 15, 16, and 17)

Policy HE-3.2 Streamlined Permitting: The City shall continue to streamline the local permit review and approval processes for affordable and infill housing projects. (Programs 15, 17 and 18)

Policy HE-3.3 Application and Development Fees: The City shall strive to ensure that application and development fees do not unnecessarily constrain production of new infill and multifamily housing. (Program 16)

Policy HE-3.4 Defer Fees for Affordable Housing: The City shall continue waiving and deferring eligible fees to help offset development costs for affordable housing. (Program 16)

Policy HE-3.5 Creativity and Flexibility: The City shall allow for flexibility in the application of development standards to encourage creative and innovative housing solutions. (Program 18)

GOAL HE-3 IMPLEMENTATION PROGRAMS

Program 15. Development Code Revisions: As part of the Comprehensive Development Code Update, the City shall complete the following changes to the Development Code:

- Amend the Development Code to allow care homes for six persons or fewer in the RE zone to fully comply with State law, which requires group homes for six or fewer to be treated as a single family home.
- Amend the Development Code to allow care homes for more than six persons without a Uuse Ppermit, to comply with State law.
- State explicitly in the Development Code that 100 percent residential projects are allowed in CD, CN, and CG districts as is currently allowed in practice.
- Expand Development Code to allow residential projects in all residential and commercial zoning designations.
- Continue to permit all types of housing (single family, multi-unit, and multifamily) uses "by-right" and expand "by-right" land uses for businesses and services that support housing.
-
- Update Use Permit findings (used for review of residential uses) to be objective.
- ~~Update Design Review findings to be objective.~~
- Update Design Review ~~Guidelines (subjective) to~~ Standards to increase their (objectivitye).
- Amend the Development Code to allow employee housing for six persons or fewer~~less~~ in the same way residential structures are allowed in zones allowing residential uses.
- Amend the Development Code to update standards for emergency shelters, including parking, minimum distance, and any other updates needed for consistency with ~~current~~ State law.
- Include a State-compliant definition of "family" in the Development Code.
- Amend the Development Code and possible General Plan to encourage future transitions in disadvantaged communities via new commercial/industrial zones that would remove heavy industrial uses from many of the South Stockton areas.
- Evaluate the possibility of implementing SB 10 (Planning and Zoning Law) in appropriate areas of the city.
- Per the agreements with the Department of Justice and Sierra Club, the City shall create new industrial design and operational standards that will regulate new industrial uses and buildings adjacent to residential communities.
- Explore additional community benefit options that could be included in the criteria for initiating modified and new Development Agreements. These benefits could include Inclusionary Housing requirements and fees, Community Benefit agreements, increase land dedications for future city services, and join-lease agreements for schools and civic uses.

Quantified Objectives: N/A

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: ~~December 31, 2023~~Early 2024

Program 16. Fiscally Positive Impact Fees: The City's adopted impact fees on new development or other ongoing funding mechanisms (e.g., community facilities districts) are fiscally positive to the City. The City shall continue to consider the impacts on the cost, supply, and affordability of housing and ensure that fees do not unduly constrain housing development by continuing to monitor the Residential Development Public Facilities Fees (PFFs) Exemption Program, Citywide Affordable Housing Development Public Facilities Fees Exemption Program, Greater Downtown Stockton Residential Development Public Facilities Fees Exemption Program, and Stockton Economic Stimulus Plan (SESP) fee reduction components to ensure they

are addressing potential constraints. The City ~~is considering modifying the SESP program to only address multi family projects~~will ~~explore~~consider possible revisions to the aforementioned programs and explore additional programs as part of the HAP and Public Facilities Fees (PFFs) updates that are occurring in 2023/2024~~-~~.

Quantified Objectives: Provide exemptions and reductions to 200 housing units to reduce overpayment for housing costs and reduce displacement risk.

Potential Funding: General Fund

Who Is Responsible: Community Development Department, Public Works Department~~, Administrative Services Department~~

Time Frame: Annually, evaluate exemptions provided and determine whether all constraints to housing development associated with impact fees or other funding mechanisms are sufficiently addressed. If it is found that they are not being addressed, modifications will be made to one or more exemption programs within one year. This will occur after each annual review until the end of the planning period.

Program 17. Streamline Approvals for Affordable Housing Projects: The City will develop a preliminary application form and procedure or will formally adopt the Preliminary Application Form developed by the California Department of Housing and Community Development (HCD), pursuant to SB 330. The City will also establish a written policy and/or procedure, and other guidance as appropriate, to specify the SB 35 streamlining approval process and standards for eligible projects under Government Code Section 65913.4. The applications will be available on the City's website for developers interested in pursuing the streamlined process or vesting rights.

Quantified Objectives: 300 new units permitted~~N/A~~

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Develop or adopt HCD's SB 330 preliminary application form by December 2024. Develop an SB 35 streamlined approval process by June 2025 and implement as applications are received.

Program 18. Density Bonuses: The City will continue to allow density bonuses that exceed State requirements and periodically amend its Development Code to comply with changes in California's density bonus law (Government Code Section 65915 et seq., as revised) and will promote the use of density bonuses for lower-income units by providing information through a brochure in City buildings and on the City's website. In addition, as part of the Development Code process the City will explore the creation of a new staff level process that would allow projects for all income levels to exceed density maximums (General Plan prescribed and 100-percent bonuses).

Quantified Objectives: Facilitate the construction of 1,000 lower-income units to increase mobility opportunities; encourage density bonus units in high-resource areas.

Potential Funding: General Fund and grant funding

Who Is Responsible: Community Development Department

Time Frame: Complete as part of Comprehensive Development Code Update by ~~December 31, 2023~~early 202~~3~~4; annually review Development Code and revise as needed; produce brochures and make information available on the City's website by December 2024.

GOAL HE-4 AND ASSOCIATED POLICIES

GOAL HE-4: PRESERVE EXISTING HOUSING. CONSERVE AND ENHANCE EXISTING HOUSING IN STOCKTON'S NEIGHBORHOODS.

Policy HE-4.1 Preserve Existing Affordable Housing: The City shall seek to preserve existing affordable rental housing, such as subsidized apartments for lower-income households, mobile homes in mobile home parks, and low-cost private rental housing. (Program 19 and 22)

Policy HE-4.2 Housing Maintenance and Rehabilitation: The City shall encourage maintenance, repair, and rehabilitation of existing owner-occupied, rental, and affordable housing to prevent deterioration of housing and ensure that housing is safe and sanitary. (Program 20)

Policy HE-4.3 Housing Unit Replacement: The City shall promote the removal and replacement of dilapidated housing units in compliance with State law regarding replacement of existing affordable housing. (Program 21 and 22)

Policy HE-4.4 Property Management: The City shall encourage good property management practices in rental properties through regulatory agreements, informational items, code enforcement staffing, the Crime Free Multi-family Housing program, and the City's rental inspection ordinance. (Program 21)

GOAL HE-4 IMPLEMENTATION PROGRAMS

Program 19. Preserve At-Risk Units: Pursuant to Assembly Bill (AB) 1521, the City will monitor the list of all dwellings in Stockton that are subsidized by government funding or low-income housing developed through local regulations or incentives. The list will include, at a minimum, the number of units, the type of government program, and the date on which the units are at risk to convert to market-rate dwellings. There have been 392 units (see Analysis of At-Risk Housing section in the Regional Housing Needs Assessment) identified as at risk of converting to market rate within ten (10) years of the beginning of the 6th Cycle Housing Element planning period. The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/ occupancy; and the date on which the units are at risk to convert to market rate. The City will work to reduce the potential conversion of any units to market rate, in order to reduce the potential for displacement and/or placement of additional constraints on the existing affordable housing stock through the following actions:

- Monitor the status of affordable projects, rental projects, and manufactured homes in Stockton. Should the property owner(s) indicate a~~the~~ desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability.
- Provide information on at-risk housing as well as other housing options and programs for residents and housing advocates on the City's website.
- If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher ~~(Section 8)~~ program. Funding sources may include state or local funding sources to reduce potential for displacement of residents.

Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within three (3) years, 12 months, and six (6) months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to

conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements, that were part of a project granted a density bonus, or that were part of a project that received other incentives.

If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing administration / management.

When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market values is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing in the Ccity. The City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the ~~45- or~~ 55-year restriction shall be "rolled over" for another ~~45 or~~ 55 years to protect "at-risk" units.

Quantified Objectives: Continue to monitor the 392 assisted units, and if any become at risk, work with property owners to develop a strategy to provide assistance to maintain or replace 392 at-risk units as affordable to reduce potential for displacement of tenants and loss of affordable housing stock in the city.

Potential Funding: HOME, CDBG, CalHOME

Who Is Responsible: Economic Development Department

Time Frame: Ongoing communication with owners, service providers, and eligible potential purchasers; work with owners of deed-restricted units on an ongoing basis, in particular at the time of change of ownership.

Program 20. Housing Rehabilitation Programs: The City shall continue to administer its owner-occupied loan program and emergency repair program using a variety of funding sources, including CDBG and HOME funds. The City will improve communication regarding rehabilitation assistance programs currently available for lower-income households, including to eligible owners of mobile homes, and rental property owners to alleviate substandard conditions. The City is currently conducting a study that included a windshield survey of the former redevelopment areas and opportunity zones to identify parcels/properties with physical signs of deterioration, vacant properties, and potential environmentally contaminated sites. The results of the study and survey will inform priorities for rehabilitation during the planning period. In addition, t~~T~~he HAP and Neighborhood Action Plans will outline underutilized and vacant parcels as well as complete a housing condition survey to indicate units in need or repair.

Quantified Objectives: Assist 300 lower-income units to address potential displacement, especially in areas of the city with the poorest housing conditions.

Potential Funding: HOME, CDBG, CalHOME

Who Is Responsible: Economic Development Department

Time Frame: Complete study and survey in 2023. Rehabilitation program is ongoing.

Program 21. Code Enforcement Program: The City shall continue to inspect housing units in targeted areas to check for building code violations. In situations where properties cannot be rehabilitated, the City will continue to enforce the removal and replacement of substandard units.

Quantified Objectives: Inspect 2,000 units annually

Potential Funding: CDBG

Who Is Responsible: Police Department: Neighborhood Services Division

Time Frame: Ongoing

Program 22. Replacement of Existing Affordable Units: In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development that removes existing residential units (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. ~~The HAP and Neighborhood Action Plans will outline underutilized and vacant parcels as well as complete a housing condition survey to indicate units in need or repair.~~ This requirement applies to:

- Nonvacant sites
- Vacant sites with previous residential uses that have been vacated or demolished.

Quantified Objectives: N/A

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Ongoing

GOAL HE-5 AND ASSOCIATED POLICIES

GOAL HE-5: PROVIDE EQUITABLE HOUSING AND SUPPORTIVE SERVICES. PROVIDE A RANGE OF HOUSING OPPORTUNITIES AND SERVICES FOR HOUSEHOLDS WITH SPECIAL NEEDS, PROMOTE HOUSING OPPORTUNITIES FOR ALL RESIDENTS, AND SUPPORT THE ELIMINATION OF DISCRIMINATION IN HOUSING.

Policy HE-5.1 Special Needs Accommodation: The City shall seek to accommodate housing and shelter for residents with special needs through appropriate zoning standards and permit processes. (Programs 23, 24, 25, 26, and 27)

Policy HE-5.2 Homeless Needs: The City shall strive to address the shelter needs of its homeless residents, and continue to support the provision of facilities and services to meet the needs of homeless individuals and families. (Program 23)

Policy HE-5.3 Temporary Housing: The City shall support temporary housing for individuals with special needs (e.g., seniors who have experienced abuse or neglect, individuals who may be at physical or psychological risk, mentally ill homeless individuals, those with HIV/AIDS or other debilitating illnesses) in board and care homes and respite centers. (Program 23)

Policy HE-5.4 Large Households: The City shall encourage the development of single-family and multifamily housing affordable to large households. (Program 28)

Policy HE-5.5 Households with Language Barriers: The City shall make information available on housing opportunities and programs to residents who are primarily non-English speaking. (Program 28)

Policy HE-5.6 Housing for Persons with Disabilities: The City shall encourage the development of housing accessible to people with disabilities, including developmental disabilities. -The City shall ensure equal access to housing by providing reasonable accommodation for individuals with disabilities. (Programs 24, 25, and 27)

~~Policy HE-5.7 Reasonable Accommodation: The City shall ensure equal access to housing by providing reasonable accommodation for individuals with disabilities. (Program 27)~~

Policy HE-5.7~~8~~ Farmworkers: The City shall work with San Joaquin County in efforts to increase the availability of safe, sound, and affordable housing for farmworkers. (Program 26)

Policy HE-5.8~~9~~ Prohibit Discrimination: The City shall support the strict observance and enforcement of anti-discrimination laws and practices including prohibiting discrimination in the sale or rental of housing with regard to race, color, national origin, ancestry, religion, disability, source of income, gender/gender identity, sexual orientation, marital status, and familial status. (Programs 28 and 30)

Policy HE-5.9~~10~~ Affirmatively Further Fair Housing: The City shall affirmatively further fair housing consistent with State and F~~f~~ederal law through implementation of programs in this Housing Element and in all other City practices. (Program 28 and 29)

GOAL HE-5 IMPLEMENTATION PROGRAMS

Program 23. Continue to Support Organizations Assisting Homeless Persons: The City shall annually apply for and continue to pursue State and F~~f~~ederal funds available to the City, private donations, and volunteer assistance to support homeless shelters. The City shall continue to provide financial assistance from its Emergency Solutions Grant (ESG) funding to homeless service providers and continue to support additional development of shelter facilities as requested by shelter providers. In addition, the City shall review the need for additional shelter facilities and services when it updates its Consolidated Plan.

Quantified Objectives: Annually, assist up to 2,000 unduplicated homeless persons; and 1,000 households at-risk of homelessness with limited-term rental assistance or utility payments. As part of this, increase the number of board and care or other types of residential or transitional care facilities for vulnerable populations by 300-500 beds.

Potential Funding: ESG, CDBG

Who Is Responsible: Economic Development Department

Time Frame: Apply for funding annually

Program 24. Continue to Assist the Disabled in Community Development Block Grant Project Areas: The City shall continue to include special provisions for housing the disabled in CDBG project areas, including mobility grants for homes (e.g., Emergency Repair Program) and accessibility features.

Quantified Objectives: Provide mobility assistance home-repair grants for 120 low-income individuals and households in Stockton, including rental units for owners of four (4) or fewer rental units.

Potential Funding: CDBG

Who Is Responsible: Economic Development Department, Public Works Department

Time Frame: Annually, contingent upon CDBG funding

Program 25. Universal Design: Update the City's standards in the Development Code to encourage universal design features in new homes and accessory dwelling units and improve access to housing for senior residents and other residents with disabilities.

Quantified Objectives: 100 housing units with universal design features to facilitate accessibility for persons with disabilities and seniors; encouraging at least five (5) of these units to be located near transit stations and services.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Make updates as part of the Comprehensive Development Code update by ~~December 31, 2023~~early 2024

Program 26. Assist Farm Workers and other Members of the Workforce: The City shall continue to provide ongoing assistance to farm laborers by working with the San Joaquin Housing Authority, San Joaquin County, agricultural employers, farm labor housing advocates, and the development community to develop affordable, decent housing, including rental housing, for farm workers. The City will update how employee housing (including housing for agricultural workers) is allowed in the Development Code in Program 12.

Quantified Objectives: Assist other organizations in developing at least 500 units of housing for farmworkers in Stockton or in the C~~c~~ounty during the planning period.

Potential Funding: CDBG, HOME, CalHOME

Who Is Responsible: Economic Development Department

Time Frame: Meet twice per year to explore opportunities for farmworker housing

Program 27. Addressing the Needs of Those with Disabilities: The City shall continue to work with the Valley Mountain Regional Center to implement an outreach program that informs families in the C~~c~~ity about housing and services available for persons with developmental disabilities. The program includes informational brochures, and information is available on the City's website. For compliance with State law, the City will revise or delete the following two findings for granting a reasonable accommodation:

- Whether the requested reasonable accommodation adequately considers the physical attributes of the property and structures.
- Whether alternative reasonable accommodations could provide an equivalent level of benefit.

The City will also make the following revisions:

- Section 16.214.030 Definitions: "'Individual with a disability'" means any person who has a medical condition, physical disability, or mental disability that substantially limits one (1) or more of the person's major life activities, as those terms are defined in the Acts." The City's definition here aligns with the federal, but not the state definition of disability. To comply with Government Code § Gov. Code §12926.1(c), the City will strike the word "substantially". The City shall also include a complete definition of disability: The Act protects any of the following: an individual with a physical or mental impairment that limits one or more major life activities; anyone who is regarded as having any such impairment; or anyone who has a record of having such an impairment. Individuals in recovery from drug or alcohol abuse are protected by federal and state fair housing laws. However, individuals currently using illegal substances are not protected under the law, unless they have a separate disability.

- The Development Code shall be updated to be clear that protections afforded people with disabilities under federal and state fair housing laws extend to those who are associated with them, including providers and developers of housing for people with disabilities.

- Section 16.214.060 Application Filing: A provision will be made to ensure confidentiality of the person with a disability's contact and medical information. Further, this section will make clear that not only may a person with a disability file an application, but also an organization serving people with disabilities (e.g. sober living homes, transitional or supportive housing for people with disabilities, etc.)

- Section 16.214.070 Review and Processing: The City will remove the requirement to notify neighbors of a reasonable accommodation request, to ensure meaningful access to the City's land use and zoning programs under the ADA and to affirmatively further fair housing under AB 686 and the Fair Housing Act.

- Section 16.214.080 Findings and Decision: The City will add a clause making it clear that if the request is denied because it would impose an undue financial and administrative burden on the County and/or would require a fundamental alteration to the zoning or building laws, policies or procedures of the County, the Director or their designee must engage in an interactive process with the person seeking the accommodation to determine if there is another reasonable accommodation that may provide an equivalent level of benefit.

- Section 16.214.090 Appeals: Revise to state that appeals will be directed to the City Manager in consultation with the ADA Coordinator, in order to ensure confidentiality.

The City shall also prepare public information brochures and website information on reasonable accommodations for disabled persons and translate the materials to provide information to residents with language barriers. The City shall make this information available at the public counter and distribute the materials to community groups and organizations that represent persons with disabilities.

Quantified Objectives: N/A

Potential Funding: General Fund

Who Is Responsible: Economic Development Department

Time Frame: Revise the Reasonable Accommodation ~~findings~~ procedure including the findings as part of the Comprehensive Development Code Update by ~~December 31, 2023~~early 2024. Prepare public information on Reasonable Accommodations by June 2024. Continue to partner with the Valley Mountain Regional Center and review the materials on the City website annually starting in 2024 and update as needed after each annual review.

Program 28. Practices to Affirmatively Further Fair Housing: In compliance with California Government Code Sections 8899.50, 65583(c)(5), 65583(c)(10), and 65583.2(a) (AB 686), develop a plan to "affirmatively further fair housing" (AFFH). The AFFH plan shall take actions to address significant disparities in housing access and needs for all persons regardless of race, color, religion, sex, gender/gender identity, sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability and any other characteristic protected by the California Fair Employment and Housing Act (Part 2.8, commencing with Section 12900, of Division 3 of Title 2), Government Code Section 65008, and any other state and federal fair housing and planning law.

Specific actions include:

- Implement the following strategies to affirmatively further fair housing in coordination with the efforts of this action:
  - Strategies to facilitate housing mobility/expand affordable housing in high opportunity areas: Programs 6, 10, 12, 13, 15, 24, 25
  - Strategies to reduce or prevent displacement/place-based revitalization strategies: Programs 4, 7, 9, 14, 16, 19, 20, 21, 22, 29
- The City shall continue to provide funds from its CDBG Program to San Joaquin County Fair Housing to provide fair housing counseling and education and outreach efforts to C~~c~~ity residents. In addition to providing contact information for San Joaquin Fair Housing on the City's website (under the Housing Division), the City shall continue to make referrals to Fair Housing as issues/cases come to the City's attention. The City shall also work with Fair Housing to periodically review and update fair housing brochures that are provided to the public and posted on the City's website. The City shall distribute fair housing information at City offices, the library, community centers,

and other community facilities. These actions are ongoing. Review fair housing materials every two years starting in 2024. Update materials as needed every two years following the review. The City will assist at least 200 residents annually through the complaint referral process. If fewer than 200 residents use the process, provide assistance to all that do.

- The City will educate selected staff in the Community Development, Economic Development, City Attorney, and City Manager departments on responding to complaints received regarding potential claims of housing discrimination and provide these selected personnel with a handout detailing the process for someone with a complaint and the agency that should be contacted regarding a claim: Legal Aid of Northern California. The City will also maintain a log ~~at the City Attorney's office~~ of all complaints received. The initial ~~T~~training of City staff will start in 2024; with updated ~~conduct updated~~ training ~~with new staff and to keep up with changes in the law every~~occurring two (2) years thereafter to align with changes to state law.
- The City will also work with San Joaquin Fair Housing to ~~provide~~ explore additional training to housing providers to prevent discriminatory actions and behaviors. If the City does not have enough staff capacity to conduct ~~The City will contract with a fair housing provider to provide~~ housing audits in order to reduce displacement risk, particularly in lower opportunity areas of Stockton, the City will explore contracting with a fair housing provider or outside housing consultant to provide assistance~~ing b~~. ~~B~~y March 2025, and then later reviewed annually. ~~,~~ The steps in the process would be the City ~~will~~ issu~~inge~~ a Request for Proposals for partnership with an external consultant to provide th~~eis~~ service of conducting housing audits annually.~~.~~ ~~The City will initiate solicitation and contracting with an organization to assist the City with providing housing audits annually.~~ The City w~~ould~~~~ill~~ either renew the contract or seek a new fair housing provider to provide the same service on a yearly basis.
- The City shall review and update its Analysis of Impediments to Fair Housing Report every five years. The next update is scheduled to happen in 2025.
- Should the City conduct a new General Plan Update within the housing cycle, the elements will be updated to strengthen existing AFFH and equity programs as well as a new disadvantaged community inventory for city and unincorporated areas within the City's sphere of influence.
- The City shall post its Annual Housing Element Progress Reports to HCD on the City website annually in the Spring after the report is completed.
- The City will implement multilingual communication and outreach strategies for City-funded affordable housing developments as follows. To increase access to City housing programs and remove barriers to homeownership, provide translation services in the most common languages spoken locally at all public meetings by July 2024 and ensure all public materials are translated and made available.
- In order to assist with the high percentage of households living in overcrowded situations, the City will continue to encourage rental developments to add additional bedrooms and will consider prioritizing the use of HOME funds for rental projects, provided that some of the units have three or more bedrooms with a goal of approving 100 units with three or more bedrooms.
- Incentivize on-site child care in mixed use and multifamily development, particularly for projects in areas with higher proportions of single parent households.
- The City shall explore best practices for Rent Stabilization and Just Cause Evictions to increase the certainty and fairness within the residential rental market in the City in addition to the protection granted by California Civil Code Section 1946.2. Exploration may include efforts associated with the Housing Action Plan or additional outreach efforts specific to the topic presented.

Quantified Objectives: See individual strategies bulleted in the program language at left with specific targets.

Potential Funding: CDBG; HOME*; General Fund*

Who Is Responsible: Economic Development Department, Community Development Department

Time Frame: Refer to each strategy *in this Affirmatively Furthering Fair Housing (AFFH) program for specific time frames.*

Program 29. Environmental Health and Access to Resources: Environmental health is determined by air quality, climate change related outcomes, water quality, cancer prevalence, and more. Neighborhoods with poor environmental health conditions are often correlated to their proximity to industrial uses, major transit corridors, and other larger pollution sources. The City will facilitate environmental health-oriented, place-based revitalization of neighborhoods, particularly for housing in closer proximity to the lowest scoring areas in terms of environmental health, including the Port of Stockton along the San Joaquin River, Rough and Ready Island, downtown Stockton, and industrial areas east of the Union Pacific Railroad and south of Duck Creek to the southern boundary of the city adjacent to the Stockton Municipal Airport, which are more heavily impacted by pollution from prior industrial uses and diesel particulate matter from proximity to regional freeways and rail lines, through the following strategies:

- Update the City's Parks and Recreation Master Plan and continue to enhance existing parks, open space, and tree plantings and provide new parks and open space in these areas to improve environmental health. Facilitate safe pedestrian and bicycle access to parks or open spaces to reduce environmental health disparities across the city. Implement this objective during the CIP process.
- Work with Caltrans to reduce regional air quality impacts associated with regional transportation facilities. The City will meet with Caltrans annually, as feasible, to identify options for air quality improvements and coordinate action implementation.
- Partner with regional transit agencies and other organizations to address transit needs of those with disabilities including non-fixed-route transportation including paratransit, dial-a-ride, reduced-fare taxis or volunteer driver programs.
- Increase active transportation facilities in Downtown and South Stockton to reduce dependence on automobiles and enhance safe connections to existing pedestrian and bicycle routes. The City will identify at least two active transportation projects in these areas of the city by June 2025. The City has completed a sidewalk survey as part of the Neighborhood Action Plans (in Little Manila/Gleason Park, Cabral Station and South Airport Way areas) to identify gaps and where repairs are needed. As part of implementation of the Neighborhood Action Plans, the city plans to pursue funding to assist property owners with repair and installation of sidewalks in the three study areas. Funding could come from local sources such as the City's General Fund or State or federal sources such as the Safe Routes to School Program.
- Meet with school district representatives by June 2025 to analyze whether housing security poses a barrier. Work with the school districts to assist in securing grant funding for teacher recruitment and retention bonuses, classroom materials, and other incentives for teachers to facilitate positive learning environments citywide.
- Implement new commercial/industrial zoning in South Stockton (details are provided in Program 15)

Implement new industrial zoning ~~zoning~~ standards and processing for reviewing existing and future industrial projects adjacent to residential uses (details are provided in Program 15)

Quantified Objectives: See individual strategies bulleted in the program language at left with specific targets.

Potential Funding: General Fund

Who Is Responsible: Community Development Department and Public Works Department

Time Frame: Refer to each strategy in this program for specific time frames.

Program 30. Removal of Racially Restrictive Covenants: Historically, covenants that restricted the sale of property to Whites or Caucasians-only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, if there are properties owned by the City of Stockton found to have racially restrictive covenants, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property purchased will require removal of any racially restrictive housing covenant prior to recording the property in the

City's name. Additionally, State law (AB 1466) gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Since July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant and establish an implementation plan to identify unlawful restrictive covenants in the records of their office. The City will develop a program to support and encourage individual property owners to remove such restrictions from their deeds and provide information about accessing the County process to do so. The City will use its social media platforms, website, and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants.

Quantified Objectives: Remove all racially restrictive covenants from Stockton City-owned properties by ~~June~~ December 2025 and assist in the removal of all ~~from~~ known privately owned properties by the end of the ~~planning~~ 6th housing cycle~~period~~. Advertise County program starting in 2025; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2025, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 20 property owners annually to support their efforts to remove restrictions from their deeds.

Potential Funding: General Fund; grants *if offered through a State or County program*

Who Is Responsible: Community Development Department; San Joaquin County Recorder

Time Frame: Remove all covenants on City-owned properties by ~~June~~ December 2025; launch informational campaign between June and December 2025; encouragement of removal of covenants from private properties is ongoing.

IMPLEMENTATION PROGRAM TABLE

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
Goal HE-1: Increase Housing Production and Ensure Adequate Land for All Housing Types and Income Levels		
1. Adequate Sites Monitoring and No Net Loss	Continue to maintain sufficient sites to address 12,673 units	Update inventory annually as part of the Housing Element Annual Progress Report and assess "no net loss" as projects come forward on Housing Element sites
2. Downtown Implementation	4,400 residential units in the Greater Downtown Area by 2040	Adopt Comprehensive Development Code Update and HAP by early 2024; and annually thereafter to identify any additional strategies to address General Plan goals.~~Adopt Comprehensive Development Code Update by end of 2023; annually thereafter identify any additional strategies to address the settlement agreement~~General Plan ~~goals.~~
3. Sites Included in Previous Housing Elements	437 residential units on 16 repeat sites identified in Appendix A that don't already allow residential development by right.~~246 residential units on 9 repeat sites that don't already allow residential development by right~~	Update Development Code and, if needed, Land Use Element by December 31, 2026
4. Public Facilities Repair and Replacement	5 public facility/ infrastructure projects	Annually
5. Housing and Neighborhood Action Plans	Permit 1,000 residential units	Late 2023
6. Accessory Dwelling Units	Approve 180 ADUs over the course of the planning period, targeting areas of high opportunity, specifically the following neighborhoods - Brookside/Country Club, Weston Ranch, Eight Mile/Bear Creek, Midtown around the University of the Pacific (between I-5 and "Miracle Mile/Pacific Avenue), western Upper Hammer/Thornton Rd, and eastern Morada/Holman.	Starting in November 2024, evaluate the consistency of Stockton's ADU regulations with State law and update accordingly. Continue to make ADU materials available; evaluate effectiveness of ADU approvals every other year, starting April 2025; and, identify additional site capacity, if needed, by December 2026. Apply annually, or as grants are available, for funding to support ADU incentives.~~Starting in November 2024, evaluate the consistency of Stockton's ADU regulations with state law and update accordingly. Continue to make ADU materials available; evaluate effectiveness of ADU approvals every other year, starting April 2025; and identify additional site capacity, if needed, by December 2026. Apply annually for funding to support ADU incentives.~~
7. Infill Strategy	100 extremely low-income units and 150 other lower income units; funding for 10 brownfield sites minimum	Adopt Housing Action Plan by the end of 2023. Implement Housing Action Plan strategies by 2025. Annually, beginning in 2026, identify any additional strategies needed to address overpayment and reduce displacement risk and implement them within 2 years of identification.

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
8. Infill Site Assembly	Facilitate lot consolidation to produce sites for 2,300 moderate and above moderate residential units	Ongoing, as projects come forward; establish program to connect property owners and developers by June 2026.
Goal HE-2: Provide High Quality Housing for All Income Groups		
9. Coordination with the Housing Authority of San Joaquin County	Provide vouchers to 3,800 households in Stockton and assist these lower income households in accessing rental opportunities with Housing Choice Vouchers to facilitate housing mobility	Ongoing; establish education program by the end of 2024 and distribute information. Then distribute information at least annually through the end of the planning period.
10. State and Federal Funding	Fund 200 extremely low-, 400 very low-, 450 low-income units; Provide down payment assistance to 75 low-income households, particularly in high opportunity areas.	Review funding opportunities annually; down payment assistance program is ongoing
11. Priority Sewer and Water Service for Affordable Housing	Include in Development Code as part of Comprehensive Update~~N/A~~	Include in Development Code as part of Comprehensive Update by ~~December 31, 2023~~early 2024
12. Property Assessed Clean Energy (PACE) Program	Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs.	Ongoing
13. Green-Up Stockton	Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs.	Ongoing
14. Weatherization Activities	200 units weatherized	Ongoing
Goal HE-3: Remove Governmental Constraints		
15. Development Code Revisions	N/A	~~December 31, 2023~~Early 2024
16. Fiscally Positive Impact Fees	Provide exemptions and reductions to 200 housing units to reduce overpayment for housing costs and reduce displacement risk.	Annually, evaluate exemptions provided and determine whether all constraints to housing development associated with impact fees or other funding mechanisms are sufficiently addressed. If it is found that they are not being addressed, modifications will be made to one or more exemption programs within one year. This will occur after each annual review until the end of the planning period.
17. Streamline Approvals for Affordable Housing Projects	300 new units permitted ~~N/A~~	Develop or adopt HCD's SB 330 preliminary application form by December 2024. Develop an SB 35 streamlined approval process by June 2025 and implement as applications are received.

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
18. Density Bonuses	Facilitate the construction of 1,000 lower-income units to increase mobility opportunities; encourage density bonus units in high-resource areas.	Complete as part of Comprehensive Development Code Update by early 2024; annually review Development Code and revise as needed; produce brochures and make information available on the City's website by December 2024.~~Complete as part of Comprehensive Development Code Update by December 31, 2023; annually review Development Code and revise as needed; produce brochures and make information available on the City's website by December 2024.~~
Goal HE-4: Preserve Existing Housing		
19. Preserve At-Risk Units	Continue to monitor the 392 assisted units, and if any become at risk, work with property owners to develop a strategy to provide assistance to maintain or replace 392 at-risk units as affordable to reduce potential for displacement of tenants and loss of affordable housing stock in the city.	Ongoing communication with owners, service providers, and eligible potential purchasers; work with owners of deed-restricted units on an ongoing basis, in particular at the time of change of ownership.
20. Housing Rehabilitation Programs	Assist 300 lower-income units to address potential displacement, especially in areas of the city with the poorest housing conditions.	Complete study and survey in 2023. Rehabilitation program is ongoing.
21. Code Enforcement Program	Inspect 2,000 units annually	Ongoing
22. Replacement of Existing Affordable Units	N/A	Ongoing
Goal HE-5: Provide Equitable Housing and Supportive Services		
23. Continue to Support Organizations Assisting Homeless Persons	Annually, assist up to 2,000 unduplicated homeless persons; and 1,000 households at-risk of homelessness with limited-term rental assistance or utility payments. As part of this, increase the number of board and care or other types of residential or transitional care facilities for vulnerable populations by 300-500 beds. .	Apply for funding annually
24. Continue to Assist the Disabled in Community Development Block Grant Project Areas	Provide mobility assistance home-repair grants for 120 low-income individuals and households in Stockton, including rental units for owners of four (4) or fewer rental units.~~Provide mobility assistance home-repair grants for 120 low-income individuals and households in Stockton, including rental units for owners of 4 or fewer rental units.~~	Annually, contingent upon CDBG funding
25. Universal Design	100 housing units with universal design features to facilitate accessibility for persons with disabilities and seniors; encouraging at least five (5) of these units to be located near transit stations and	Make updates as part of the Comprehensive Development Code update by early 2024~~Make updates as part of the Comprehensive Development Code update by~~

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
	services.~~100 housing units with universal design features to facilitate accessibility for persons with disabilities and seniors; encouraging at least 5 of these units to be located near transit stations and services.~~	~~December 31, 2023~~
26. Assist Farm Workers and other Members of the Workforce	Assist other organizations in developing at least 100 units or housing for farmworkers in Stockton or in the C~~c~~ounty during the planning period.	Meet twice per year to explore opportunities for farmworker housing
27. Addressing the Needs of Those with Disabilities	N/A	Revise the Reasonable Accommodation procedure including the findings as part of the Comprehensive Development Code Update by early 2024. Prepare public information on Reasonable Accommodations by June 2024. Continue to partner with the Valley Mountain Regional Center and review the materials on the City website annually starting in 2024 and update as needed after each annual review.~~Revise the Reasonable Accommodation findings as part of the Comprehensive Development Code Update by December 31, 2023. Prepare public information on Reasonable Accommodations by June 2024. Continue to partner with the Valley Mountain Regional Center and review the materials on the City website annually starting in 2024 and update as needed after each annual review.~~
28. Practices to Affirmatively Further Fair Housing	See individual strategies bulleted in the program language at left with specific targets.	Refer to each strategy in this Affirmatively Furthering Fair Housing (AFFH) program for specific time frames.
29. Environmental Health and Access to Resources	See individual strategies bulleted in the program language at left with specific targets.	Refer to each strategy in this program for specific time frames.
30. Removal of Racially Restrictive Covenants	Remove all racially restrictive covenants from Stockton City-owned properties by December 2025 and assist in the removal of all known privately owned properties by the end of the 6th housing cycle. Advertise County program starting in 2025; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2025, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 20 property owners annually to support their efforts to remove restrictions from their deeds. ~~Remove all racially restrictive covenants from Stockton City-owned properties by June 2025 and from privately owned properties by the end of the planning period. Advertise County program starting in 2025; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2025, with ongoing reminders in City publications and at City events.~~	Remove all covenants on City-owned properties by December 2025; launch informational campaign between June and December 2025; encouragement of removal of covenants from private properties is ongoing.~~Remove all covenants on City-owned properties by June 2025; launch informational campaign between June and December 2025; encouragement of removal of covenants from private properties is ongoing.~~

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
	~~Support County enforcement of this State requirement as appropriate through City actions. Work with at least 20 property owners annually to support their efforts to remove restrictions from their deeds.~~	

QUANTIFIED OBJECTIVES

Table HE-1 below summarizes the City's quantified objectives for new construction, rehabilitation, preservation, and housing assistance over an eight-year time frame. These quantified objectives represent targets. They are estimates based on past experience, anticipated funding levels, and anticipated housing market conditions.

Table HE-1: SUMMARY OF QUANTIFIED OBJECTIVES

2023-2031

PROGRAM	EXTREMELY LOW	VERY LOW	LOW	MODERATE	ABOVE-MODERATE	TOTAL HOUSEHOLDS
New Construction[1]	1,232	1,233	1,548	2,572	6,088	**12,673**
Rehabilitation[2]	700	900	900	-	-	**2,500**
Conservation/Preservation of At-Risk Units[3]	600	957	985	825	825	**4,192**

Notes:

1. Corresponds to the City's RHNA.
2. Corresponds to objectives in Programs 14, 20, and 21.
3. Corresponds to the at-risk affordable assisted units in the city (see Housing Needs Assessment, Table HE-42 and Program 19) and objectives from Programs 9 aiming to conserve existing housing.

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Shape Stockton Housing and Neighborhood Feedback Summary-*updated June 2023*

The following comments summarize feedback received from all workshops, study sessions, neighborhood meetings, go-to-them-events, stakeholder interviews, and one-on-one meetings.

HOUSING

General Comments

- Existing buildings have problems with windows and egress.
- Need to maintain and improve the code to allow mixed-use and downtown residential more viable.
- Having to meet all residential and all commercial development codes is expensive.
- People who moved into live-work lofts were living but not working there.
- Residential is by-right in CD zone, which helps.
- If Stockton wants more housing, it needs to create business and make it easier to develop 3-story garden apartments with stairs and no elevator. can't do 4 stories with elevators or podiums and justified by the rents. Three stories usually hit around 24 units/acre.
- The city didn't want apartments previously but has changed its tune and now supports them.
- Notice more than just property owners directly impacted by the efforts.
- Consider inclusionary housing policies for the City.
- Concern about equity and housing justice; protect against gentrification.
- Consider inclusionary housing and a community land trust.
- 60-80 units per acre is the minimum number of units some need for a new affordable housing project. Mutual Housing is working on a project that is about 120 units per acre, but this project could be up to 200 units per acre.
- Infrastructure and environment can be a big issue in infill sites.
- What happens if the City does not hit its RHNA numbers?
- Explore the affordable gap in private project development.
- Explore or encourage the use of Master Development Plans.
- Does the City give bonds to help out with construction costs?
- How is the Housing Action Plan (HAP) useful if it is not legally binding?
- Include more CEQA streamlining recommendations and allowances.
- City doesn't do anything to help low-income communities on the edges/fringes.
- Are there sub-categories within lower income?
- Some sites identified have constraints, so they haven't been developed yet. For example, title issues, infrastructure issues, and environmental constraints.
- The City process of working with applicants and saying yes to projects has improved, but more work is needed. The City could be more proactive than reactive in helping projects progress.
- Need exemptions for offsite infrastructure improvements for affordable housing - cost kills projects.
- City must find funding for outdated offsite infrastructure (streetlights/sidewalks).
- EIFDs to attract developers.
- Nonprofit projects shouldn't be treated like for-profit development.
- Infill costs of deferred maintenance put off onto affordable projects makes them no longer affordable.
- The City should maintain impact fee waivers for affordable projects.
- Priority sites should follow the dollars/funding sources, be transparent with funding sources, and encourage flexibility with sites.
- Further streamlining of the permit process.
- Pre-designed plans or approvals would help, especially with infill/scattered site development.
- Need the ability for waivers on oddly shaped parcels.
- Funders avoid items that trigger prevailing wages.

- Interested in Adaptive Reuse of buildings downtown and any potential waivers/incentives in the Development Code that could help them attract developers.
- Parking reductions don't help them, as tenants are not located near quality transit want to park.
- Stockton lacks quality transit as compared to Sacramento, and maybe when we get there, less parking outside the downtown will help, but not now.
- The area needs a better bike/ped system.
- SESP has made projects pencil out. With rising interest rates, without SESP, they would stop building in Stockton due to financial constraints.
- RSSC is forming a Housing Justice coalition creating separate entity. Will the City be a part of that effort.

NEIGHBORHOOD PLANS

General Comments

- Do not concentrate on affordable housing in one place.
- People need help beyond housing, including education and jobs. Some people do not want government assistance or housing support.
- Improve homelessness and safety in all three Study Areas.
- Landlords are pushing people out of their homes. Address emergency housing situations in the plans. Police are also clearing encampments and belongings.
- Allow an environment that is conducive to promoting/improving properties; improve customer service at the Planning counter.
- People drive fast on Pock Lane, there is a need for speed bumps.
- There is a need for police patrol at the farmer's market.
- Re-stripe streets where needed. There are inoperable cars on the street that need to be removed.
- Improve and maintain parks throughout the City, especially the basketball courts. Most parks are safe during the day but feel unsafe at night.
- There is a need for remodeling and renovation of old dilapidated businesses. Perhaps more City money or grants could help with this.
- Addressing safety concerns should be the main focus.
- There is a need for duplex/triplex/fourplex units in these neighborhoods. Could be rentals or ownership units, but they need to be attainable. It would be nice to have a program to help people purchase these units.
- Provide resources and housing opportunities for the homeless.
- Reach out to the community and ask them what they would like to see in their neighborhood. The Dorothy Jones Community Center could be a venue option for an open house in South Airport Way. Talk with the churches in these areas to spread the word about the open house. Lueathel from the African American Chamber of Commerce San Joaquin is part of the Ministerial Alliance that meets at a church near South Airport Way. They can help spread the word about the open house. Work closely with Assembly Bill 617.
- Community ambassadors can help address safety concerns in these neighborhoods, especially in South Airport Way.
- The wages for jobs in Stockton must equal the cost of living. People that live here commute outside of Stockton for work. There are not a lot of high-paying jobs in San Joaquin County.
- People cannot afford to buy homes because they are getting priced out by bay area investors.
- There are multiple generations living in the same home in Stockton. The COVID-19 pandemic increased this issue.
- Take into consideration parking when planning new housing in these areas.

- There is a need for affordable housing in Stockton, especially in North Stockton. Prioritize higher-density multifamily housing that is affordable and near transit.
- There are no benches at many bus stops.
- Support the placement of new housing in walkable areas near grocery stores. Help ensure single-family homes are being purchased by individuals and families instead of organizations.
- Are there plans to form a committee as part of the Neighborhood Action Plan effort?
- Reach out to the community to ask them about their housing needs. Hold pop-ups at an existing event or maybe at a park. Attend resource fairs. Use Stockonia.org to advertise events. Go to churches and have a booth (St. George's is the main church). Utilize Council Members to spread the word.
- Barriers to housing include community opposition and drug abuse. There is also not enough space to build housing.
- People cannot afford homes because they are getting priced out.
- There are vacant industrial buildings that are underutilized.
- High development impact fees can be a barrier to housing development, one of our developers was charged a significant amount of school fees.
- Timing is important for developers; they lose money each month their project is delayed. Treat developers as customers.
- Support adaptive reuse of buildings like the Anaheim Packing building.
- There is a need for hotels, especially in downtown Stockton.
- Hatch workshop could benefit from some type of support.
- Build relationships with hotels and support the conversion of hotels to homes.
- Recommends the City create a homeownership training course that is available for the public. Do workshops in the encampments to boost the morale of the people living there.
- Support mixed-use housing development in these neighborhoods. There is a need for housing with wrap-around services, including a pharmacy, health services, and food. Also recommends live/work units.
- There is land that is underutilized and could be used for housing, but the owners do not want to do anything with the land.
- Housing needs to be accessible for the elderly and people with disabilities.
- There are people that commute to Amazon but do not live in Stockton. Consider how we can provide housing and activities for young people to entice them to live in the City. Young people need a place to live with parking. Provide nice walking trails or tracks where people can walk and play games.
- Some neighborhoods have a liquor store instead of a grocery store.
- Encourage the San Joaquin Regional Transit District bus to run more often.
- Infrastructure can be a barrier to housing development in all three neighborhoods, especially sewer and water upgrades. Funding for infrastructure upgrades can also be an issue. Some grants kick in prevailing wages which increases the cost to build new housing.
- Building affordable housing tends to pencil out more than market-rate housing in Stockton because of the funding opportunities.
- Look into the GreenMeansGo program from the Sacramento Area Council of Governments as a potential funding source.
- Environmental cleanup can also be a constraint.
- It could be costly to upgrade the telecom boxes, but this does not come up often when developing housing.
- It would help if the owner could give the land to an affordable housing developer and/or not charge the holding cost.

- Enterprise is working on a displacement assessment for the City. Maybe some of the actions can tie into the action plans.
- There is a need for quality education, jobs, and housing in all study areas.
- Safety and drug use is a concern.
- Hold a training session for the board members and youth before starting the project's engagement efforts. Maybe hold a charette style workshop. Provide a one to two-month notice before scheduling an outreach event or training.
- Look into the Reconnecting Communities Pilot program. The National Parks Service has a History of Equal Rights grant opportunity.
- Consider the Hatch Workshop as a venue for outreach.
- The City does not have the funding needed for new affordable housing development. There is typically a need for local money to build affordable housing. Fee waivers or free land helps affordable housing developers. Also, the monthly rates housing developers can charge in San Joaquin County is much lower compared to other Counties. There is a need for project-based vouchers to get rental assistance for affordable projects.
- The more concessions and incentives the City can provide for affordable housing projects the better. Parking can be an issue, requiring less parking in areas that are near public transit.
- The City has opportunities to tap into State funds that could help pencil out affordable housing projects. Permanent Local Housing Allocation (PLHA) grants are one example.
- Lessening the permit review time can help since affordable housing developers cannot apply for grants until the entitlement process is finished. It can be burdensome for affordable housing development. Also, having one point of contact throughout the development review process is helpful instead of having multiple contacts.
- Basic amenities nearby are needed for new affordable housing development, including schools, transit, and grocery stores. New affordable housing near high quality transit opens up additional funding sources from the State, such as the Affordable Housing and Sustainable Communities grant.
- To qualify for a large family affordable housing project, a developer needs a minimum of 25 percent two-bedroom and 25 percent three-bedroom units.
- For a senior or supportive housing project, a developer might need a one-acre site. 2.5 to 3 acres could be needed for a family affordable housing project.
- Job training, workforce development and education would help the unhoused population. Encourage small business opportunities.
- The roads are unsafe for pedestrians and bicyclists, people drive fast on the roads in these neighborhoods. Make sure the bikeways are connected.
- Reinvent South Stockton Coalition is working with the Community Foundation to create a Stockton housing innovation fund that would be Citywide. It would be a private housing trust fund.
- Low-income apartments are needed in these neighborhoods. Visionary Homebuilders is a good partner, they build great properties. Maintenance of apartments is also important.
- The three study areas were hard to reach and hard to count for the census. An aging group of seniors and youth may not have services or amenities in these areas. Everyone is trying to figure out how to address issues in these neighborhoods.
- The lack of broadband and internet access is also an issue. There is no broadband in Little Manila/Gleason Park. Communication is very important; look into how to increase access in these neighborhoods.
- Transportation is an issue in these areas. The elderly need support to get to and from the doctor’s office.
- Educational attainment is a concern in these neighborhoods.
- Health disparities exist in these neighborhoods. A lot of people do not want to live on the freeway because of air pollution.

- The parks are not safe in these neighborhoods.
- There is a lot of veterans in these neighborhoods and registered sex offenders. There is a need for mental health services.
- To reach these communities, recommend sending out people that can be trusted by each community group should knock on doors. The San Joaquin County Hispanic Chamber of Commerce had success during the Census gathering because of this effort. They also handed out information through paychecks. The utility bill is also a good place to insert information.
- We need homes with four to five bedrooms because multiple families could live in the same home.
- Better wi-fi is needed in new apartments. Work with the creator of Pac West to increase internet access in these neighborhoods.
- All three areas are uniquely different, but they have the same need for affordable and market-rate housing that can bring some new life to it. There is a need for missing middle housing.
- If there are environmental issues at any site, reach out to the State to see what can be done in terms of funding to clean up the site.
- San Joaquin Partnership is working with the County Office of Education, University of Pacific, Worknet and Delta College on a program for the next generation of workers. Look at the Volt Institute in Modesto. Focus on text generation programs that include mechanics, artificial intelligence, and robotics.
- Set up a working group or some type of meeting with housing developers.
- Support for infill development with wrap-around services.
- There is a need for housing for families, such as duplexes, triplexes, apartments with two or more bedrooms.
- Cost of materials and labor is a barrier to housing development. The cost has gone down recently, but it is still expensive.
- There are absentee owners that change the dynamic of the neighborhood.
- Transportation can be an issue since some households in the area might only have one car per family.
- Educate landowners and homeowners about accessory dwelling units and junior dwelling units.
- Engage the landowners in the neighborhoods to ask them why they are not developing the sites.
- Resident input is very important. Talk with Reinvent Stockton Coalition, Little Manila Rising, Seventh Day Adventist Church, San Joaquin Council of Governments, public health services. Attending the farmers market event STAND holds. STAND also has two trust builders that go door to door. Identify the community member that is willing to be a leader to spread the word. STAND also sends out an eblast we can include information on. Work with the Housing Authority. Keep the messaging simple. Visuals work well. Talk with Saint Linus Church. Loop in the police department.
- The Notice of Funding Availability (NOFA) applications can be challenging. They are on a point system, and you need to show where the amenities are in proximity to the proposed housing development.
- Look for vacant land where no one is living.

Cabral/East Cabral Comments

- There has been at least one walking study completed from the Cabral station to the Amtrak station. The study found it was difficult to cross the streets in some areas and there are also handicap issues. There is also an issue with lighting during the wintertime since it gets dark earlier. Some of the lights under the freeway are broken. The homeless might be breaking the lights so people are not able to see where they are sleeping.
- There are key neighborhood commercial nodes in the Cabral/East Cabral/East Cabral Station Area, including along Wilson Way, Weber, and California. Think about how the action plans will promote sustainable corridors. This area needs more green space. Is the City working on a Downtown Station plan? Think about connectivity to

the Cabral Train Station. Maybe the City can provide pedestrian friendly wayfinding from the train station. SJCOG is working with the rail commission to install bicycle parking at the rail station. There are not a lot of activities in downtown. Maybe live/work and mixed-use housing could work here. Look at circulation and mobility. How can we improve circulation in this neighborhood?

- Nonresponsive owners in the Cabral/East Cabral Station Area are an issue. There is a need for services and amenities in this area. Be mindful of building housing next to freeways.
- There is a need for streetlights that work and improved sidewalks. The walk from Amtrak to the Cabral Train station does not feel safe.
- There must be a mix of market-rate and affordable housing in the Cabral/East Cabral Station Area. Build housing that provides a certain percentage of market-rate and affordable units. Find ways to incentivize market-rate housing. Maybe the City can waive certain fees. The City of Modesto has a forgiveness program the City can look into which waives certain planning and building fees for new development downtown.
- There is a need for rental housing. However, in the Cabral/East Cabral Station Area, lower the number of rental units so there are also homeownership opportunities for those living in this neighborhood.
- Cabral/East Cabral Station Area has been a big interest for a mixed-use development with complimentary amenities for some time.
- Make building multifamily, affordable housing near the train station easier. There are examples out there that we can look at to see how can build market-rate housing near rail. Make sure vacancy rates are low. Corridors need to be cleaned up. Larger sites are owned by a handful of entities, so getting them together can be challenging.
- Pedestrian scale lighting standards should be added for safety as well as a wayfinding program.
- For smaller lots, the City should explore infill allowances for zero and/or small setbacks.
- The City should explore a transit-oriented development overlay to encourage more development by allowing no height restrictions, greater densities, flexible parking standards, and prohibiting specific auto-oriented uses (drive-throughs, fueling stations, carwashes, storage, etc.).

Little Manila/Gleason Park Comments

- There is an opportunity for placemaking and orienting people to the history of the Little Manila/Gleason Park study area. Maybe some improvements can be made to signify that this area is a gateway into the City. Market this area as a place that is worthy of people visiting. Access to the train station is challenging. We need a clear access point from the train station. Orient buildings and development towards the Mormon Slough. Maybe we can add a greenway along the Mormon Slough.
- During the walking tour of Little Manila/Gleason Park, the consultant team noticed: broken, uneven sidewalks; lack of trees and shade; no crosswalk on South San Joaquin Street and East Sonora Street; cars drive fast; and there are no trash bins. A schoolteacher cleans the street where she lives because there is daily trash in the street (a nearby restaurant that opens VERY early – the primary clientele is day laborers.)
- Live/work units could work well in Little Manila/Gleason Park and in the Cabral/East Cabral Station Area. Provide a space where artists can work and live.
- Gleason Park is the last major development that has occurred in the Little Manila/Gleason Park neighborhood.
- Ideas for reimagining Mormon slough includes bike lanes and a community garden.
- There will be a new navigation center near Little Manila/Gleason Park that will provide case management.
- There is a need for champions in Little Manila/Gleason Park that will encourage neighbors to maintain their properties.
- There are corner store markets in Little Manila/Gleason Park, but they do not offer healthy food options.

- The lot sizes in Little Manila/Gleason Park constrain housing development. Housing preservation could work in this area. GRID has a single-family retrofit program the project team could look into.
- In the Little Manila/Gleason Park neighborhood, multiple families live in one home. There are also very few grocery stores in this neighborhood. Several agencies serve the unhoused community living in this neighborhood, people are fearful of the homeless. Talk to the police department.
- Improvement ideas proposed for the Mormon Slough include a bike trail, community center or a place for the youth, park, walking trail, and affordable housing near the slough.
- A potential new housing site in Little Manila/Gleason Park could include the parking lot on Sutter Street next to the community garden. It is an underutilized parking lot. Can also consider the parking lot and house at 520 South Hunter Street. Little Manila Rising is planning to build housing on the top floors of their two buildings.
- Lack of curb cuts and inaccessible sidewalks is an issue in Little Manila/Gleason Park. The tree wells are also not large enough for tree planting. There are concerns about asthma in this neighborhood. Buildings in Little Manila might not be up to code.
- Little Manila Rising may become a Community Development Corporation in a few years. How often does the Mormon Slough get water? Think about why the unhoused population congregates there. Maybe the City can build tiny homes. Bakersfield received an award for its plan on river access. Promote nontraditional models of housing for the homeless.
- The Little Manila/Gleason Park area could be developed further. Mormon Slough should be a priority, addressing the challenges occurring here. To address the small lot size issues in this study area, talk to the property owners to get buy in to adjust the lot sizes. Give people options.
- Maybe live/work units could work near the Mormon slough.
- The Central Valley is trying to target tech and 30 year old's that are not ready to buy a home yet.
- The San Joaquin Partnership have been receiving calls related to data centers.
- The area needs pedestrian-scale lighting standards and increased coverage standards.
- Traffic calming measures should be included (Bulb-outs, safe pedestrian crossings, etc.).
- For smaller lots, the City should explore infill allowances for zero and/or small setbacks.
- Larger tree wells to accommodate trees provide benefits beyond ornamental/aesthetic function.

South AirPort Area Comments

- There are commercial needs along the South Airport Way corridor.
- A lot of families in the South Airport Way neighborhood do not have transportation. Create a lively vibrant place where people can walk.
- Acknowledge the County fairgrounds When talking with people about the South Airport Way study area.
- One of the strategies is a community land trust.
- The 8th Street and South Airport Way project is a catalyst project for this neighborhood; moving this project along as much as possible is very important.
- In the South Airport Way study area, the City could help housing developers by showing the environmental issues in this area.
- Faith-based housing development could also be investigated.
- Consider extending the area boundary further south to examine how the industrial plays into the residential areas. There may be climate-related funding opportunities in this area. South Airport Way also needs rapid bus transit.
- Access to fresh foods is a need for the South Airport Way neighborhood. There is also a need for thriving businesses, parks, outdoor open spaces, and grocery stores in this neighborhood. There is a safety concern in this area.

- Put beds or tiny homes on the old racetrack for the homeless.
- Think about what can be developed in the South Airport Way study area. There is a need for commercials as there is a food desert. Need to have access to grocery stores and other amenities.
- Reinvent South Stockton Coalition is looking at a low-income homeowner rehab program that could be for Fairview Terrace or Citywide.
- There is a plan for bikeways along South Airport Way. There is an opportunity for transit-oriented development near the bus transit stop. Provide transportation opportunities to the job center area to the south. There are challenges for people to get to the job center after hours. Consider where there are opportunities to put housing and other amenities along the South Airport Way corridor.
- South Airport Way is a very busy street. The streets are not conducive or safe for walking. The levee could be a nice place where people can walk, but there are homeless people in this area and some people feel unsafe. From Carpenter Street to Fair Street there are at least six schools. Promote safe routes to schools along this route. Build a walking path from the Sierra Vista affordable housing development to the Dorothy Jones Community Center. Have a participatory list where people can rotate and walk kids to school.
- Lots along South Airport Way might have environmental contamination issues which is a barrier to development since it is expensive to clean up the site. For example, the site located at the southeast corner of Ophir Street and 8th Street has environmental issues. The lot adjacent to Rancho San Miguel is also contaminated.
- South Airport way needs more multifamily housing and commercial development to support housing.
- South Airport Way has the highest rates of asthma, lowest education rates. There is also a concern about crime and safety. Trees are needed in this neighborhood. South Airport way is a food desert. The corridor also needs more streetlights.
- The South Airport Area study area is pretty built in from a residential perspective. Look down Mariposa Road.
- Look at the internet cable and where the water connection is located. Cable was very expensive to bring out there.
- Expand the boundary to Charter Way and encourage a grocery store or shopping center. There are also other dilapidated areas in the City to consider. The area around Ponce is worse than Sierra Vista.
- The City should explore minimum heights and/or stories to require larger nonresidential uses along Airport.
- Encourage the creation and use of more private and public owed spaces.
- Increase the amount of street trees/landscaping along Airport and side streets.
- Enhanced paving materials along Airport and side streets.
- Specific options for benches/trash receptacles/lighting/etc.
- Pedestrian-scale lighting standards.

SAFETY ELEMENT UDPATES

- Climate change is an issue and adaption, and resiliency must be addressed in City standards.
- Service and evacuation routes should be updated to reflect environmental and climate change impacts.

Disability Rights California
California's protection & advocacy system

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RE: Follow Up Letter Regarding Stockton's Revised Housing Element, June 2023 Public Draft

Dear Planning Department Staff, Consultants, Mayor Lincoln, and City Councilmembers:

DRC appreciates the City of Stockton's incorporation of some of the comments DRC made regarding the City's April 2023 Draft of its Housing Element – notably a commitment to update its reasonable accommodation ordinance and to coordinate with the regional transit authority to ensure accessible transit for people with disabilities. Please find DRC's May 15, 2023 original comment letter here as Attachment A.

Notably, the City did not integrate important recommendations such as:

(1) a Program for Supportive Housing for People with Disabilities,
(2) Meaningful Housing Programs for Unhoused Stocktonians,
(3) Programs for the expansion of Tenant Rights; or,
(4) other recommendations for disabled Stocktonians.

While we thank the City's Planning Department for the revisions it did adopt, we still urge the City to make changes to align with our recommendations in Attachment A, DRC's May 15, 2023 Letter to the City with Comments on Stockton's Public Draft Housing Element, April 2023.

The City Fails to Affirmatively Further Fair Housing in the Current Draft

A. The City of Stockton's Revised Housing Element Contains Zero Plans for Permanent Housing for Stockton's 5,000 and Counting Houseless Individuals.

The City's needs assessment, assessment of governmental constraints, and programs regarding unhoused are inconsistent with state and federal law. The State has committed to Housing First principles, affirmatively furthering fair housing, and must abide by the federal Fair Housing Act, Constitution, and the Americans with Disabilities Act.

First, the City needs to proactively commit to exploring its own data and analysis, as well as the analysis provided by trusted community partners like the Stockton Housing Justice Coalition, St. Mary's Dining Hall, and DRC. The City should utilize the data and analysis it has, and use it to craft Programs which reflect the verifiable needs of the Stockton community for housing. These Programs must have well-articulated steps, timelines, and quantifiable objectives proportional to the needs for housing for the people of Stockton.

In response to DRC's initial comments that the City's estimate of its unhoused population is low, the City states that it will continue to monitor counts of unhoused as they are updated by qualified providers. *See* City of Stockton, *Revised Draft Housing Element,* pg. 378/454, June 2023.

According to Community Based Organizations working with homeless in the many encampments in Stockton, the number is closer to 5,000 people who may need emergency shelter on any given night. These numbers are based on local projections provided by our regional partners. For example, DRC holds a free legal clinic at St. Mary's Dining Hall, a community based organization which substantiates the 5,000 homeless it serves in Stockton; a qualified source. The majority of the people who visit the clinic do not have their SSI or General Relief; though they meet definitions for various disability listings per the federal Social Security Administration and/or are categorically eligible at 65 years of age or older. There is also an apparent dearth of shelters and services for LGBTQIA+ Homeless Youth and Adults, undocumented people, undocumented farmworkers, DV Survivors, undocumented DV survivors, and/or undocumented DV survivors with children, or people with disabilities with children. So, we urge the City to commit to evaluating its data regarding the unhoused population, as well as their intersectional needs.

Further, the needs assessment should address the intersection of disability, homelessness, and criminal legal system involvement: (1) the City should recognize that people who are chronically homeless are by definition people with disabilities for their analysis of special populations, (2) unhoused Stocktonians who are formerly incarcerated face incredible barriers to housing in Stockton as they face criminal background checks to obtain it, and (3) people who are formerly incarcerated are mostly people of color and people with disabilities. When we add the intersection of homelessness to a person who is formerly incarcerated *and disabled,* the actual housing choice this person has in Stockton amounts to essentially none.

Second, as discussed in DRC's First Letter- Attachment A, Stockton Municipal Code, Title 8, Chapter 8.100 "Protection of Critical Infrastructure" must be addressed as a barrier to housing for people who are unhoused and disabled. This Ordinance is among the most punitive and restrictive in the State. It broadly defines "critical infrastructure" to include locations ranging from hospitals to parks and then bans "camping" near those areas at the risk of misdemeanor charges and **up to $25,000** in daily fines. Criminalization, hefty fines, and loss of resources resulting from sweeps authorized by this Ordinance will inevitably lead to a cycle of homelessness that is impossible for a person, especially a

person with disabilities, to escape. It is widely known that houselessness has a significant disparate impact based on race[1] and disability.

The City states, regarding this Ordinance, that: "Staff believes this does not create a barrier to establishing or being housed in a new shelter as defined by state law." *See* City of Stockton, *Revised Draft Housing Element*, pg. 369/454, June 2023. The City does not analyze whether the Ordinance is a barrier or not, it misconstrues shelter as housing, and does not address what the cycle of displacing people without providing services does to contribute to worsened housing stability. The City must address the impact of such an Ordinance both as a governmental constraint as well as an impediment to AFFH.

Even if the City's camping ban were not so punitive, the City has not identified appropriate services and housing for its unhoused community and has no program to address that issue. Community groups in the City of Stockton such as the Stockton Echo Chamber, Faith in the Valley, and the Stockton Housing Justice Coalition, have told the City: "No Displacement Without Navigation." However, through DRC's community work, it knows there are not adequate public benefit services, shelter services, housing, food, transportation, housing or housing-related services *to navigate people to.*

To address this in a meaningful way, the City cannot undercount those who need to be housed. Under Program 23, the City states it aims to assist up to 2,000 unduplicated homeless persons; and 1,000 households at-risk of homelessness, with limited-term rental assistance or utility payments. As part of this, the City states it will increase the number of board and care or other types of residential or transitional care facilities for vulnerable populations by 300-500 beds. The ADA's integration mandate and *Olmstead v. L.C. et al*, 527 US 581 (1999), the landmark Supreme Court case finding that the Americans with Disabilities Act ensures the right of people with disabilities to live and receive services in the most integrated setting appropriate, including to live in their homes and communities instead of in institutions, and to have greater independence, autonomy, and opportunities to participate fully in civic life: demands more of the City. Through our role as the state's Protection and Advocacy agency, we know that board and cares and other residential facilities are institutional settings and not the "most integrated" setting appropriate for the vast majority of unhoused individuals. *See Olmstead v. L.C. et al,* 527 US at 591-92, 596.

[1] *See* University of California San Francisco, *Toward a New Understanding: The California Statewide Study of People Experiencing Homelessness*, June 2023.

Indeed, a federal Department of Justice investigation into Alameda County noted that county's lack of permanent supported housing and stated that: "Unable to access this evidence-based service, many individuals go to board and care homes instead. Board and care homes provide some minimal care and supervision, but residents frequently lack access to needed services and meaningful community life; further, these facilities tend to be overcrowded and highly variable in quality."[2] Instead, as articulated by Welfare and Institutions Code § 8255 et seq: permanent, evidence-based, housing solutions are necessary. But the Housing Element only indicates that there are 34 permanent supportive housing units for foster youth and 40 for people who are chronically homeless. *See* City of Stockton, *Revised Public Draft*, pg. 76/454, June 2023. Yet, Program 23 makes no mention of assisting unhoused individuals through permanent housing. Housing options should be community-based, allow for freedom to come and go, and not have onerous rules. The current Revised Element's focus on the creation of shelter beds or board and cares does not satisfy the City's duty to AFFH: a bed is not a home. We urge the City to refer to Attachment A, and meaningfully explain what programs will be put in place to address the housing needs of the 5,000 and counting unhoused people living in Stockton.

B. The City's Revised Housing Element has Zero Programs to Prevent Displacement of Stockton's Tenants Who Comprise Half of All Households in Stockton—Approximately 150,000 Households.[3]

As discussed in DRC's previous letter (Attachment A), displacement can create unique harms to people with disabilities, who may have developed formal and informal systems of care, developed accessible transportation routes, and/or modified their homes to accommodate their needs. Displacement can disrupt these systems in a way that is devastating to a person's health.

1.Tenant Protection Policies

[2] U.S. Department of Justice, Civil Rights Division, Letter to Alameda County Board of Supervisors, County Sheriff/Coroner, and Alameda Health System: *Notice Regarding Investigation of Alameda County, John George Psychiatric Hospital, and Santa Rita Jail*, April 22, 2021.

[3] U.S. Census Bureau, Quick Facts, *Stockton [C]ity, California: Owner-occupied housing unit rate*, 2017-2021: 51.2%, accessed August 17, 2023.

We advocated for neighborhood stabilization and tenant protection policies which have the most direct and immediate effect on mitigating displacement– this includes a strong local Rent Stabilization Program, including for mobile home parks. The City replied that interviews with the development community have indicated that the housing market (rental/sales) in Stockton do not have the capacity to absorb significant fee increases or significant losses in revenue that would impact net operating income. However, this does not absolve the City of responsibility to create meaningful programs to AFFH under AB 686.

While we are heartened to see that the draft Housing Element now includes a specific action under Program 28 (Practices to Affirmatively Further Fair Housing) to "explore best practices for Rent Stabilization and Just Cause Evictions," and references the 2019 Tenant Protection Act (Civ. Code § 1946.2), the City must commit to doing more than merely "explore best practices" given the urgent needs of City residents.

We urge the City to implement tenant protections which include a Right to Counsel Program, a Tenant Bill of Rights, a Housing Trust Fund, Land banking, and Rent Stabilization, as discussed in more detail in Attachment A. Notably, half of all households in the City of Stockton are renters. This is for a City of approximately 300,000 households, meaning over 150,000 households rent in the City. A significant number of these 150,000 households are on the brink of homelessness for reasons discussed in Attachment A. Stronger tenant protections are needed to meaningfully AFFH for over half of Stockton's population under AB 686.

Regarding code enforcement, we recommended that the program include tenant protections to prevent displacement (see displacement discussion above). This could include creating a Rent Escrow Account Program as well as engaging in proactive inspection. DRC can provide sample programs if needed. As part of this program, the City should include enforcement of existing accessibility standards. Local governments can affirmatively further fair housing by ensuring that Code Enforcement staff understand accessibility standards and are enforcing those laws.

In addition, concerningly, Policy 4.4, which cross-references Program 21, states that the City will continue to implement a Crime Free Multi-Family Housing Program. However, the California Department of Housing and Community Development's AB 686 Guidance explicitly recognizes such programs as barriers to AFFH. The City replied, the City will coordinate with the state to

assess if the program is a barrier under current housing law. However, this is not a meaningful response to DRC's comment. *See* Attachment A. Moreover, the state Attorney General has released guidance to all cities and counties, including Stockton, stating that such policies are discriminatory.[4] Nonetheless, enforcement of Stockton's ordinance remains in the Housing Element, violating the duty to AFFH.[5] Not only should the City remove this from the Housing Element, but instead it should commit to removing the Ordinance in order to comply with fair housing law.

2. Housing Preservation and Affordable Housing Development Program

Preventing displacement includes preserving existing affordable housing. Program 19 (Preserve At-Risk Units) does not outline specific actions that would, in fact, preserve at-risk affordable units from conversion to market-rate. The City only commits to monitor the status of at-risk units and "Should the property owner(s) indicate a desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability." *See* City of Stockton, *Revised Draft Housing Element*, pg. 429/454, June 2023. This puts the onus on the property owner to contact the City, and even then, the City only commits to considering to help, and states it will work to help residents get Housing Choice Vouchers instead. While the Revised Draft Housing Element now states that the City will "provide information on at-risk housing as well as other housing options and programs for residents and housing advocates on the City's website," this does not preserve at-risk units. The City must do better. At minimum, it should proactively facilitate preservation purchases by local nonprofit developers, community land trusts, and/or tenant organizations.

3. The City's Value Capture Programs are Inadequate or Unlawful

Further, the City's Program 7 suggests that it will develop a density bonus for 100% market rate units: "Density increases allowances for infill projects to

[4] State of California Office of the Attorney General, Rob Bonta, *E-mail to All Cities and Counties in California regarding "Crime-Free Housing Policies,"* April 21, 2023.

[5] *See also* 2 CCR § 12162: (a) Practices requiring persons to take actions against individuals based upon broad definitions of nuisance activities (such as considering a phone call to, or receipt of a visit or service by, law enforcement or emergency services as a nuisance), or based upon broad definitions of unlawful conduct or criminal activity. For purposes of this section, practices requiring persons to take actions against individuals include mandating initiation of eviction procedures against tenants or occupants, prohibiting renewal of an existing tenancy, or requiring the initiation of adverse actions against one or more tenants, occupants or guests.

exceed the maximum density requirement through an existing 100-percent Density Bonus or through a new process for market rate housing." While we support local density bonus ordinances that provide for greater affordability, ordinances that do not require such affordability are impermissible under Government Code § 65917, which states:

> In enacting this chapter it is the intent of the Legislature that the density bonus or other incentives offered by the city, county, or city and county pursuant to this chapter shall contribute significantly to the economic feasibility of lower income housing in proposed housing developments. In the absence of an agreement by a developer in accordance with Section 65915, a locality shall not offer a density bonus or any other incentive that would undermine the intent of this chapter.

As explained by a court determining that a city that did grant such a density bonus violated that law, a "City's approval of a density bonus for a residential project that would not qualify for a bonus under the [Density Bonus Law], and is not 'proportionately lower' than what is required by the DBL, conflicts with the language and intent of the statute." *See* Attachment B, Page 11 (the court's tentative ruling, which was adopted by the court in *Kennedy Commission et al. v. Costa Mesa et al*. Case No. 30-2016-00832585, Los Angeles Superior Court (2016)). This means that if a local density bonus ordinance requires less affordability than the DBL, then it can only allow increased density that is lower than what is provided for in the state law – the DBL sets the floor of affordability. So, the City should clarify that any updated local Density Bonus Ordinance will increase affordability.

The City Notes in Policy HE-1.11 Transit Oriented Development that it "shall encourage higher-density residential uses and mixed-use development to locate near main transportation routes to offer an alternative means of transportation to employment centers, schools, shopping, and recreational facilities and to promote walking and biking. Consistent with the General Plan policies, the City will establish Transit Oriented Development overlays as part of the Development Code Update. (Programs 2, 5 and 7)." Nothing in the implementing programs suggests that such overlays will include any affordability requirements. Given that the City is creating Neighborhood Action Plans for neighborhoods at high risk of gentrification and displacement (e.g. Little Manila and Cabral Station), it is critical to include some level of affordability (e.g. 15%) in new transit oriented construction.

C. The City's Current Housing Element Does not Plan for Supportive, Accessible, Safe, Non-segregated Housing for Stocktonians with Disabilities.

Government Code Section 65583(a)(4) requires: "an analysis of potential and actual government constraints upon the maintenance, improvement or development of housing… for persons with disabilities as identified in the analysis pursuant to paragraph (4) of subdivision (a), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting … the need for housing for persons with disabilities (see Screen 7)."

Further, Government Code Section 65583(c)(3) requires the housing element provide a program to "address and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing for persons with disabilities. The program shall remove constraints to and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities."

In addition to the Housing Element Law, the City must abide by its obligations under federal and state fair housing laws as well as the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973. For example, *Olmstead v. L.C.* et al, 527 US 581 (1999) is the landmark Supreme Court case which establishes an Integration Mandate under the Americans with Disabilities Act (ADA) finding that the ADA ensures the right of people with disabilities to live and receive services in the most integrated setting appropriate, including to live in their homes and communities instead of in institutions, and to have greater independence, autonomy, and opportunities to participate fully in civic life.

However, the City's needs analysis is incomplete – it only includes some disabilities. The requirement to analyze the needs of people with disabilities includes all disabilities, not just certain subsets. And, here, the programs and quantified objectives articulated for each program do not match the actual needs according to the City's own analysis and data. The City does not provide or identify the current total, or a goal regarding the potential number of supportive, accessible, safe, inclusive homes to be built for people with disabilities. The City thus fails to adequately quantify and analyze the housing needs of people with disabilities as required under Gov. Code § 65583(a)(7).

We urge the City to implement these objectives in its Housing Element Programs for people with disabilities.

1. Blind/Low-Vision and Deaf/Hard of Hearing Stocktonians

First, there is no discussion of the unique needs of Blind residents, nor those of Deaf residents. The City says it welcomes the chance to speak with DRC about how it can provide more services to different population groups. DRC is happy to collaborate, but the City must do more under the Housing Element Law. A common issue for people with sensory disabilities is the lack of accessible housing. In January 2012, DRC represented three nonprofit disability and fair housing advocacy groups, filing a lawsuit in federal court against the City of Los Angeles and the Los Angeles Redevelopment agency, alleging that the City's housing programs were inaccessible to people with mobility and sensory (vision and hearing) disabilities. *See Independent Living Center of Southern California et al. v. the City of Los Angeles, et al., Central District of California, Case No. 2:12-cv-000551-FMO-PJW* ("ILCSC").[6] In 2016, the case settled against the City, with a separate settlement against the Redevelopment Agency. It is one of the largest affordable housing accessibility victories, if not the largest, in the country. The agreement, among other things, requires the City to ensure that at least 4,000 of its affordable housing units meet the highly accessible standards required by federal law and to enforce policies that those units are rented to people who need those specific accessibility features. In August 2019, HUD entered into a Voluntary Compliance Agreement with Los Angeles based on similar allegations, with additional obligations, resulting in additional accessible units and policies.

From that evidence and data, as well as our statewide advocacy, we know the following are widespread barriers to access to housing for people with sensory disabilities:

- A large need for affordable, accessible housing;
- Lack of affordable accessible units and units with accessible features;
- Lack of funding for accessibility features and accommodations/ modifications;
- Little to no oversight, reporting, and enforcement regarding accessibility and fair housing compliance;

[6] Disability Rights California, *Independent Living Center of Southern California et al. v. the City of Los Angeles, et al.*, (August 2016).

- A lack of familiarity with legal obligations, resulting in widespread noncompliance;
- Failure to rent the few accessible units that do exist to people with disabilities who need the features; and,
- The Coordinated Entry System's failure to address physical accessibility.

Extensive research explains the need for increased accessibility. California's Final 2020 Analysis of Impediments to Fair Housing Choice lists lack of accessible housing stock as the tenth major impediment to fair housing in the state.[7] It explained, for example, that 62% of respondents could not find accessible units with accessibility features regardless of price.[8] We also know that most subsidized housing built prior to the last few years does not include the required accessible units. Key takeaways in the Analysis of Impediments included:

> "California has over 4 million Californians with disabilities, many of whom face extreme challenges finding housing that is affordable, accessible, and located near transit and supportive services.
>
> Nearly 75 percent of the state's housing stock was built prior to 1990 and the enactment of the Americans with Disabilities Act (ADA), the earliest federal mandate on accessible development. This means that the majority of California's housing stock is inaccessible for people with disabilities. *Lower-income households are more likely to include members with disabilities than higher-income households. Extremely low-income households are more than twice as likely to include an individual with a disability than households earning above moderate-income*."[9] [emphasis added].

The City should assess its own needs for housing accessible to people with sensory disabilities, create a program for the same, and ensure that it includes

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[7] *See* California Department of Housing and Community Development, *Analysis of Impediments to Fair Housing Choice at pg. 433: Impediment #10 Insufficient Accessible Housing Stock*, 2020.

[8] *Id*. at 40 (62% of respondents could not find an accessible units with accessibility/handicapped features regardless of price). Id. at 54 (23% of persons 65 and older have an ambulatory disability). Id. at 57 (12.8 percent of income eligible households include someone with a hearing or visual disability, 17.9 percent of income eligible households includes someone with an ambulatory disability). Id. at 381 (noncompliance with FEHO physical accessibility requirements frequently found in FEHO reviews of 19 California jurisdictions).

[9] *Id.* at 18.

quantifiable objectives for Stocktonians with vision and hearing disabilities. We also again urge the City to make the funding discussed in Program 24 available to multifamily buildings of more than 4 units.

2. Stocktonians with Intellectual and/or Developmental Disabilities (I/DD)

In California, less than 16% of adults with developmental disabilities own or rent their own homes; the overwhelming majority live with an aging caregiver – usually a parent or guardian.[10] Few have options or plans in place for when those parents or guardians die. In regard to DRC's previous comment, the City wrote, "this information has been used to update the section on those with Developmental Disabilities in the Existing Needs Assessment Section." *See* City of Stockton, Revised Draft Housing Element, pg. 382/454, June 2023. However, the City should more clearly articulate a program to address those needs. Regarding housing for people with I/DD, programs and quantifiable objectives were not added per DRC's recommendations in its first letter. (*See* Attachment A). The only plans for people with I/DD appear to be institutions: "…These residential homes are for adults with intellectual and developmental disabilities who also have medical, behavioral, or age related support needs…" The City says is will continue to work with the Valley Mountain Regional Center to implement an outreach program that informs families in the city about housing and services available for persons with developmental disabilities. However, what those are is left unknown.

The lack of affordable, accessible, inclusive housing results in prolonged institutional stays and escalated crises and traumas. And because California serves people with I/DD regionally, individuals might not be referred to units outside that region, raising fair housing concerns. Additionally, many individuals with I/DD highly value routine and familiarity. These values mean that remaining in one's own home is preferable for some than to moving into new, project-based units. While usually cost-effective, few opportunities to support someone through rental assistance exist; and, this can cause turmoil when an aging caregiver dies. We had one situation where a sibling-caregiver passed away, leaving two siblings, both with disabilities, but only one eligible for I/DD services, in the unit. Finding a way for both to remain housed required enormous advocacy and creativity that most people do not have access to.

DRC recommends the City work with Valley Mountain Regional Center and other organizations to assess the number of unhoused Stocktonians with I/DD.

[10] The Kelsey, *Cal. State Council on Dev'al. Disabilities, and the Lanterman Housing Alliance, A Crisis within a Crisis: Housing for Californians with Developmental Disabilities*, Fact Sheet, (Nov. 2019).

We also urge the City to explicitly identify some of the following issues in the Housing Element for the topics below, and collaborate with the regional center on:

- (1) committing to obtaining resources for rent-subsidized affordable housing (with services if necessary) for people with I/DD,
- (2) creating and preserving accessible housing; and,
- (3) ensuring rental-based tenant assistance meets the unique needs of people with I/DD and includes housing navigation supports for this subpopulation of people with disabilities.

Few regional centers contract with housing navigators – but people with specialized training to help place individuals in housing can be critical. Also, only relying on institutions is a potential violation of the ADA and *Olmstead,* as people with disabilities have the right to live independently in their communities.

Additionally, the City should work with the County to assess whether the Public Housing Authority of the County of San Joaquin is complying with the obligation to exclude In-home Supportive Services Income of family members serving as caregivers when it calculates household income. *See Reilly v. Marin Housing* Authority,10 Cal. 5th 583 (2020). In addition, the U.S. Department of Housing and Urban Development has updated its regulations to reflect the holding from *Reilly*, such that, effective January 1, 2024, IHSS income will be specifically excluded by regulation. *See* 24 CFR 5.609 (b)(19).

If the housing authority is not complying, that should be identified as a governmental constraint on the maintenance of housing for people with disabilities. Overall, individuals with I/DD should have the choice to live in the most integrated, non-segregated settings possible.

3. Stocktonians with Mental Health Disabilities

As recommended in our first letter, the City should separately analyze the housing needs of people with mental health disabilities and create programs to specifically address those needs. Though the City is open to exploring various types of subgroups beyond what is required by state law and the census, it has not done so in this Housing Element. *See* City of Stockton, Revised Draft Housing Element, pg. 376/454, June 2023. By not assessing the needs of people with mental health disabilities, the City has failed to adequately assess the needs of people with disabilities.

Individuals with mental health or substance use disabilities experience numerous challenges in securing affordable housing. These include denials of reasonable accommodations, crime-free policies (such as Stockton's), criminal records screening policies, credit screening policies, problems with CES programs, and requiring treatment for substance use disorder before entering housing.

As noted above, crime-free ordinances are discriminatory. But they have a uniquely negative impact on people with mental health disabilities. Individuals with disabilities, including mental health and substance use disabilities, often require emergency services to get assistance with medical issues that result from their disability.[11] And such policies disproportionately impact Black and Latinx renters[12] and people with disabilities, including mental health disabilities.[13] "[Chronic nuisance ordinances] thus force people with physical or mental disabilities to make an impossible choice between calling 911 and risking eviction or foregoing medical assistance in a crisis." So, again, the City should commit to removing its crime-free multihousing program.

DRC investigations have found that people with mental health disabilities, particularly those with serious mental illness and/or co-occurring Substance Use Disorder, are at serious risk of institutionalization and/or being unable to transition out of institutions due to the lack of affordable, accessible housing with appropriate voluntary supports. Instead of providing such housing, local authorities rely on involuntary commitment and misdemeanor criminal laws to move individuals off the street and into psychiatric institutions, emergency departments, or jails and juvenile detention facilities.[14] This often leaves people with mental health disabilities and/or SUD either institutionalized and/or houseless.

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[11] Alisha Jarwala et al., *When Disability Is a "Nuisance": How Chronic Nuisance Ordinances Push Residents with Disabilities Out of Their Homes*, 54 Harv. C.R.-C.L. L. Rev. 875 (2019).

[12] Liam Dillon, Ben Poston & Julia Barajas, *Black and Latino renters face eviction, exclusion amid police crackdowns in California*, Los Angeles Times (Nov. 19, 2020); Deborah N. Archer, *Racial Exclusion Through Crime-Free Housing Ordinances*, Am. Const. Soc'y (Nov. 2019); State of California Department of Justice, *California Task Force to Study and Develop Reparation Proposals for African Americans*, (June 2023).

[13] Alisha Jarwala et al., *When Disability Is a "Nuisance,"* 54 Harv. C.R.-C.L. L. Rev. 875 (2019).

[14] *Disability Rights California Lawsuit against Alameda County*, Disability Rights California (Sep. 9, 2021).

This cycling of individuals between houselessness and institutionalization also has a disparate impact based on race. In *Disability Rights California v. County of Alameda*, DRC challenged the unnecessary segregation of people with mental health disabilities in psychiatric institutions and the failure to ensure people with disabilities are provided the housing and services they need. DRC found that the County institutionalized people at a rate more than three-and-a-half times California's statewide average. DRC also found significant racial disparities in the behavioral health and housing systems. For example, even though Black residents make up 11% of Alameda County's population, DRC found that half of the homeless and jail populations are Black, and more than half of the people psychiatrically institutionalized ten or more times over a two-year period were Black. Thus, unnecessary institutionalization resulted in greater segregation of Black disabled individuals. As discussed above with regard to houselessness, this means that the City must identify its own ordinances that contribute to this cycle of criminalization and identify programs to increase the production of permanent supported housing – not the institutional, segregating settings currently described in the Housing Element.

4. Stocktonians with Environmental Sensitivity Disabilities

Disability Rights California participated in a site tour of roughly 25 sites in South Stockton on April 12, 2023. Consistent across all 25 sites were the proximity to industrial businesses, lack of transportation, lack of grocery stores, closeness to the I5, 99, and 4 freeways i.e. concerns for pollution, and in some areas, lack of sidewalks and proper lighting. Disability Rights California has talked to community members with disabilities and learned how the lack of sidewalks and proper lighting can prevent neighborhood access and access to opportunity, especially when an extremely limited access to food, goods, and services in the area already exists. This is particularly true for people with environmental sensitivity disabilities, which limit a person's ability to enter environments where there are certain factors including scents, pollutants, or chemicals, which make a person unable to control their allergic reactions. The scope can be mild to severe – from skin allergies to anaphylactic shock. The City must plan for housing for Stocktonians with environmental sensitivity disabilities.

5. Stocktonians with Physical Disabilities

As discussed above, with regard to people with vision and/or hearing disabilities, lack of affordable, accessible housing for people with physical disabilities is a massive problem, and identified by California as a major impediment to fair housing. DRC supports the City's Program 25, but notes that

while universal housing design is important, the Housing Element should be clear that universal design is not synonymous with full accessibility: the needs, goals, and programs should clarify that the City will encourage both. We again urge the City to inventory the amount of its housing stock that is accessible and affordable to people with vision and/or mobility impairments. If the City cannot track these, it should include a program to monitor and track such units, make such information available to the public, and enforce existing accessibility requirements. The City should also make its list of accessible, affordable units available to the public in a variety of formats.

The City states City staff are working on conducting a housing condition survey and monitoring housing capacity sites, but is not sure how a list like this would be implemented as there are a variety of factors that go into a residential unit being deemed ADA accessible in general, and that feedback from groups like DRC is needed for future discussion. *See* City of Stockton, Revised Draft Housing Element, pg. 381/454, June 2023. DRC is happy to connect on those issues, and urges the City to explicitly include the monitoring, tracking, and enforcement of ADA accessibility into its Housing Element.

We also reiterate our comment that Program 24 should be available for multifamily housing of more than 4 units. This would be an invaluable resource for disabled Stocktonians. The City should also commit to work with the regional Continuum of Care to ensure that the Coordinated Entry System 1) identifies accessibility needs of individuals in their system; 2) identifies accessible units in housing; 3) pays attention to the needs for accessibility when implementing their acuity index (assessment of needs) system; and, 4) matches un-housed people who need accessible features with units with such features.

D. Transportation for people with Disabilities is an AFFH issue

We appreciate the City has committed in Program 29 to working with its regional transit authority to address the multifaceted transit needs of people with disabilities. That said, many people with mobility disabilities have a difficult time accessing public transit, and paratransit is scarce and unreliable. These individuals often rely on adaptive vehicles.

We appreciate that the City has amended the Housing Element on page BR-195 to say that "Despite parking reductions on many projects, parking spaces for those with disabilities continue to be provided. No projects have requested to waive inclusion of parking spaces for those with disabilities." We recommend that the sentence after that be amended to state: "The City will continue to

explore best practices for parking standards and provide additional incentives to reduce costs and align standards with current housing market demands, including the needs and demands of residents with disabilities."

As explained previously, we further recommend that the City amend Program 27, Addressing the Needs of Those with Disabilities, to ensure that disabled parking spots are available even where parking minimums have been waived entirely. Accessible, available, and affordable travel options make it possible for diverse groups of people to stay active and engaged in their communities, and this is not achieved by the draft Housing Element. We also note that as the state phases out new gas vehicles in coming years, accessible electric vehicle (EV) charging stations/parking spaces should be required. Without accessible transportation, people with disabilities are left isolated and segregated.

E. The City's Current Draft Sites Inventory Will Not Satisfy HCD Requirements for AFFH Because Plans for Low Income Housing and Extremely Low Income Housing Only in South Stockton, Not Only Fails to Address the History of Racial Segregation in Stockton, it also Fails to Meet Requirements for the Environmental Element.

As discussed in DRC's first letter, the City has not shown Low Income and Extremely Low Income housing are planned anywhere in North or Central Stockton where there is less pollution. While the City certainly needs affordable housing in South Stockton, it must also identify sites in communities with lower pollution burden and greater access to resources and open space. The City's reply that, "[t]he Housing Elements Regional Housing Needs Allocation (RHNA) housing capacity sites include approved housing projects in North Stockton that account for over ten thousand units," does not address DRC's concern articulated in our first comment letter regarding the majority of *low income and extremely low income* sites being implemented in South Stockton where there is pollution actually known to cause greater instances of disability, as is reflected in Stockton's census data. *See* Attachment A. Indeed, the City notes that it has zero currently entitled lower income units, as opposed to 11,620 above-moderate sites. The City must identify affordable RHNA sites in the high opportunity areas of Stockton.

The City's current Housing Element violates California's Fair Employment and Housing Act Regulations in this regard. According to specific practices related to land use, it is illegal discrimination to make housing opportunities unavailable where others are able to access those same housing opportunities, due to a protected class, of which there are: *race, color, religion, sex, gender, gender*

identity, gender expression, sexual orientation, familial status, marital status, disability, genetic information, national origin, source of income, veteran or military status, or ancestry. *See* Cal. Gov't Code § 12955(l); CA Code of Regs. tit. 2, § 12162; Admin. Code tit. 2, § 12162, 2 CA ADC § 12162. Law; Cal. Gov't Code § 65000.

Discrimination under this subdivision specifically includes, at 2 CCR § 12161(b)(10), a policy or practice that "[r]esults in the location of toxic, polluting, and/or hazardous land uses in a manner that denies, restricts, conditions, adversely impacts, or renders infeasible the enjoyment of residence, land ownership, tenancy, or any other land use benefit related to residential use, or in connection with housing opportunities or existing or proposed dwellings."

Lastly, in regards to intersecting environmental and housing elements, the City mentions but does not include the 2008 Memorandum of Agreement between the City of Stockon, the CA Office of the Attorney General, and The Sierra Club. A copy of this document is included as Attachment C. DRC recommends it accompany all future versions of the Housing Element; and, that the City put it back on its Government website.

F. Conclusion

Please reach out to DRC at (619)814-8501 or e-mail to nichole.mendoza@disabilityrightsca.org if we can be of any assistance as the Planning Department and HCD consider these recommendations and comments. DRC is happy to continue to meet with the Planning Department and other departments of the City of Stockton to assist the City in creating its Sixth Cycle Housing Element.

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May 15, 2023

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RE: Disability Rights California's Comments on the City of Stockton's April 2023 Housing Element Public Draft

Dear Planning Department Staff, Consultants, Mayor Lincoln, and City Councilmembers:

Disability Rights California submits these initial comments on the 2023-2031 City of Stockton Housing Element April 2023 Public Review Draft ("Draft"). Disability Rights California is a private, non-profit disability rights organization federally mandated to advance and protect the human and legal rights of Californians with disabilities. 42 U.S.C. § 15001, et. seq., 42 U.S.C.§ 10801, et seq., 29 U.S.C. § 794(e), 29 U.S.C. § 3011, 29 U.S.C. § 3012; *see also* Welfare and Institutions Code §§ 4900-49005. DRC's comments on the Draft pertain to people with disabilities in the City of Stockton.

We appreciate the effort that went into this first draft and support many of the Draft programs. However, we believe the Draft needs further development to address housing needs and barriers for people with disabilities in the City. We provide the following comments and proposed changes to assist the City with creating a more inclusive Housing Element:

I. To Affirmatively Further Fair Housing, the City must outreach to all segments of the community, ensure housing opportunity throughout the community, set AFFH priorities, and set appropriate metrics and milestones.

Assembly Bill 686 (2018) defines Affirmatively Furthering Fair Housing as, "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." Gov. Code § 8899.50, subd. (a)(1). Stockton must administer its programs in a way that affirmatively furthers fair housing for members of a protected class and take no action inconsistent with that obligation. Gov. Code, § 8899.50(b)(12); Fair Housing Act, 42 U.S.C.A. § 3608(e)(5). These requirements exist to combat discrimination, overcome patterns of segregation, and foster inclusive communities.

While the federal duty to AFFH has existed for over 50 years, AB 686 creates new requirements for housing elements for: (1) Outreach, (2) Assessment of Fair Housing, (3) Site Inventory, (4) Identification and Prioritization of Contributing Factors, and (5) Goals and Action. The California Department of Housing and Community Development's publication: *Implementing AB686: Duty to Affirmatively Further Fair Housing Guidance for Housing Elements* states that common mistakes and pitfalls include:

- A high-quality Assessment of Fair Housing, but status-quo actions/programs;

- A local jurisdiction refers to a county-level Analysis of Impediments to Fair Housing previously completed;
- Does not include regional comparison in analyses;
- Only analyzes patterns of low-income sites, not all sites;
- Does not ask the public to provide input on AFFH;
- Doesn't prioritize 4-5 contributing factors & connect to programs;
- High resource areas can't rely on ADUs alone; and,
- No data dumping! Tell the story.

The City's Draft contains some of these common mistakes. We offer the following comments to help avoid some of these pitfalls.

1. Outreach

The City must reach all economic segments of the population; describe meaningful, frequent, and ongoing community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall housing element.[1] Gov. Code, § 8899.50 subd. (a)(2) further requires a summary of fair housing outreach and capacity, and the City must "receive public input and local knowledge on the Assessment of Fair Housing."

The Planning Department hosted several meetings , but did not reach renters and people at risk for or who are unhoused. The City primarily communicated with the public by online notices on its web site; however, most working people in the City do not visit the City's website. The Draft also does not incorporate local knowledge other than input from service providers.

While we appreciate the outreach to organizations serving low-income and other special needs populations, including our own, representatives who serve members of the community are not the same as community members themselves. Noticing property owners but not those who rent and those who are unhoused ignores extensive economic segments of the community. Moreover, there are no examples of the City reaching out to the Spanish-speaking community in a way that is meaningful. Additionally, people with disabilities and older adults are often unable to participate in community meetings due to communication barriers, segregation, and lack of transportation access. Thus,

[1] The CA Dept. of Housing and Community Development, *Implementing AB686: Duty to Affirmatively Further Fair Housing Guidance for Housing Elements,* https://www.hcd.ca.gov/community-development/affh/docs/affh_webinar_slides.pdf

they are often not considered in the planning processes that directly and disproportionately impact them, and are undercounted in data collection. Hearing directly from people with disabilities is critical to figuring out what housing issues they face and what types of housing works for them. Having a robust community outreach and engagement plan that ensures access to meetings and planning processes will allow program participants to gather invaluable data and information from people with disabilities and bridge the equity gap.

To better incorporate the views of all Stocktonians, the City should implement a Housing Element education campaign to educate young people, those from different language communities, and those awaiting appointments at the County's Health and Human Services Agency (333 E. Washington St.), among others. The City should reach out to the community via local radio stations in both English and Spanish. There is no other way to reach the vast working poor, disabled, renting, and homeless populations of Stockton. The people of Stockton deserve to have their voice heard in the Housing Element process. Under AB686, it is mandated.

2. Assessment of Fair Housing

Among the Assessment of Fair Housing's Requirements, we primarily address disparities in access to opportunity, displacement risk, ongoing segregation, and sites selection in this comment letter.

The City of Stockton has a population of 322,120.[2] People of color make up 78 percent of the population where Latinx people account for more than 40 percent of that total. *Id*. Stockton is the native land of the Yatchicumne, a group of Northern Valley Yokuts people.[3]

A. Disparities in Access to Opportunity

a. Environmental Justice

A major fair housing concern in Stockton is environmental injustice. Importantly, "[p]eople with disabilities are specifically exposed to and vulnerable to environmental injustice" as a result of decades of ableist and racially exclusionary policies and land use decisions. And, some are also more vulnerable

[2] Rich Ibarra, Stockton Named the Most Racially Diverse City in America, Capradio, (Jan. 2020)
[3] City of Stockton: A Look into Stockton's Past

to environmental injustice because of the nature of their disability.[4] These communities are the most impacted by pollution and other poor environmental conditions because of historic land-use decisions. For example, the percentage of people with disabilities living in areas with greater exposure to PM2.5 pollution is significantly higher than in areas with less exposure, even when controlling for other variables; this is especially true for individuals with cognitive and independent living difficulties.[5] As a result, explicitly requiring consideration of such issues when furthering fair housing is critical.

CalEnviroScreen 4.0 is a screening methodology that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. Much of Stockton falls above the 90th percentile for pollution burden in the state. In the map below, Rred indicates communities with the highest pollution burdens: most of Stockton's RHNA sites are within those red zones. As shown in Figure 1 below[6], limited RHNA sites are located in the green CALENVIROSCREEN and deeper blue, high and highest resources areas, as the majority of sites are in South Stockton. However, as the table below shows, South Stockton are the lower opportunity areas, and are also the areas hit by some of the worst pollution in the entire state. This will not AFFH.

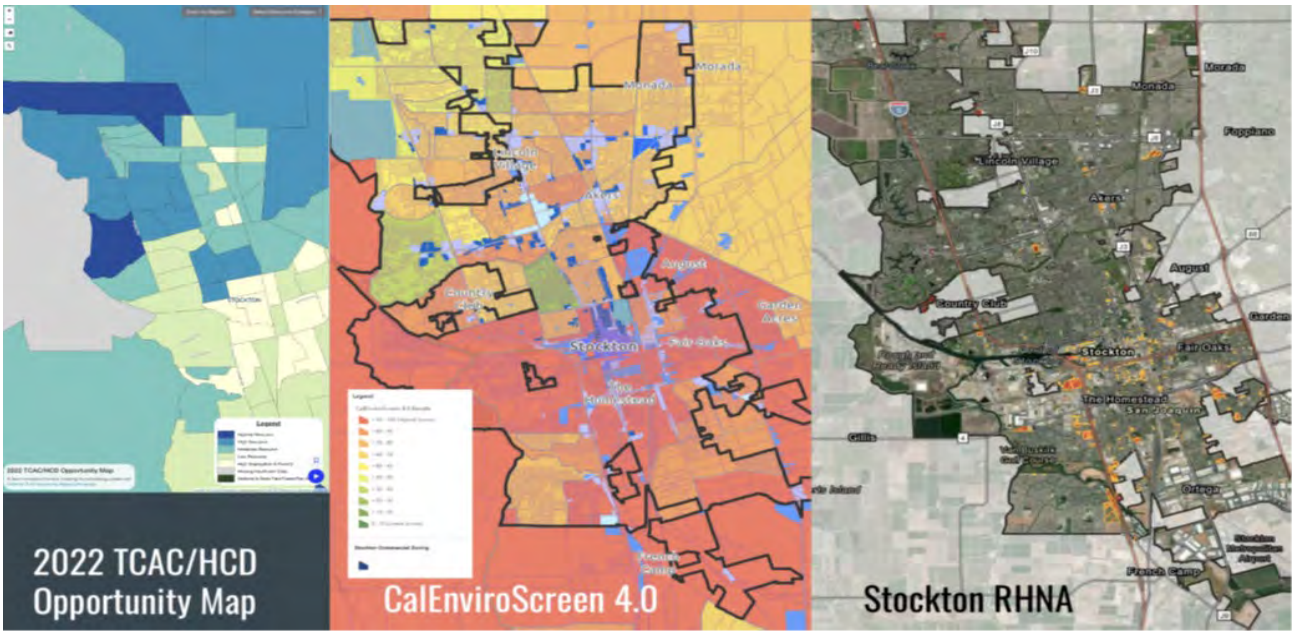


Figure 1

[4] Catherine Jampel, Intersections of disability justice, racial justice, and environmental justice, Environmental Sociology (2018).
[5] Jayajit Chakraborty, Disparities in exposure to fine particulate air pollution for people with disabilities in US, Science of the Total Environment (June 2022).
[6] *Stockton 6th Cycle Housing* Element, UC Berkeley, prepared by Bailey Schweitzer, Weiyang Tang, Joann Martinez (Dec. 2022).

b. Transportation

Transportation access is a critical piece of fair housing. However, jurisdictions often focus narrowly on the Americans with Disabilities Act's technical requirements for fixed route and paratransit, but overlook its broader mandate for equal access to the transportation system as a whole. The type of transportation necessary varies by disability and need, and it should be clear that jurisdictions should consider not only fixed-route public transportation, but also specialized services such as paratransit, dial-a-ride, reduced-fare taxis, or volunteer driver programs. Stockton should also consider availability of parking, drop off locations, bus stops, and shelters. A stronger transportation system would expand and improve affordable mobility options including: paratransit, door-to-door services; wheelchair accessible transportation network companies, and demand response real time ride systems; volunteer driver program expansions; nonprofit service provider systems; stipends/free rides for caregivers; gas subsidies, and more. The City's analysis of parking standards notes that some parking minimums have been waived for affordable housing, or that built via TOD. Unfortunately, the ADA's only technical requirement regarding parking spots for people with disabilities is that there be a percentage of spots for disabled persons. Any percentage of zero is zero. Not all disabled people can use public transit, and require a parking spot, a spot for their caregiver, or a pickup spot for paratransit vehicles. As explained below, We recommend that the City amend Program 27, Addressing the Needs of Those with Disabilities, to develop an overall accessibility program that includes ensuring that disabled parking spots are available even where parking minimums have been waived. Accessible, available, and affordable travel options make it possible for diverse groups of people to stay active and engaged in their communities.

c. Houselessness

As discussed below, unhoused individuals have a high prevalence of disability. A discussion of barriers to fair housing is not complete without recognizing that Stockton recently passed one of the most onerous and restrictive encampment sweep ordinances in California, which bans "camping" (defined as "to place, pitch or occupy camp facilities; to live temporarily in a camp facility or outdoors; to use camp paraphernalia") in areas broadly defined as "critical infrastructure" at the risk of misdemeanor charges and up to $25,000 in daily fines. The term critical infrastructure is defined to include locations ranging from hospitals to parks. Stockton, California Municipal Code, Charter, and Civil Service Rules, Title 8 Health and Safety, Chapter 8.100 Protection of Critical Infrastructure and Wildlife

Risk Areas.[7] Further, while the Ordinance was specifically created to address symptoms of homelessness[8], it does not include a requirement that people have true access to services or housing before being removed or having their property taken. This must be assessed as a barrier.

B. Displacement

We appreciate that the City recognizes that preservation and creation of affordable housing is critical to minimizing displacement risk. However, the City has recognized that the City is at risk of losing naturally occurring affordable housing due to an influx of Bay Area residents. Research and experience demonstrate that effective anti-displacement measures include housing preservation (especially for naturally occurring affordable housing), tenant protection, and affordable housing strategies.[9] The City commits to programs addressing housing preservation and affordable housing development, but not tenant protection. And some of its programs, for example, Program 14, is listed as a place-based revitalization strategy; but fails to address how to ensure that weatherization does not result in higher rents and ensuing displacement. A deeper level of analysis is necessary. Similarly, if not done with anti-displacement protections in place, Code Enforcement can do, and has done, the same.[10] Indeed, the City discusses revitalizing "blighted" areas but does not explain what "blighted" means, which neighborhoods might be impacted, and how. Historically, revitalization of blighted neighborhoods has been paired with displacement of low-income communities. Indeed, the City is removing its 5th Cycle Element program that noted that development in blighted areas would be done with an eye toward preventing gentrification. The City must engage in a deeper analysis of such risk and how its own programs can exacerbate or mitigate that risk.

Displacement can create unique harms to people with disabilities, who may have developed formal and informal systems of care, developed accessible transportation routes, and/or modified their homes to accommodate their needs. Displacement can disrupt these systems in a way that is devastating to a person's health. And, the stress of displacement alone can exacerbate symptoms of

[7] https://library.qcode.us/lib/stockton_ca/pub/municipal_code/item/title_8-chapter_8_100
[8] https://www.stocktonmayor.org/files/Legislation%20Text%20(9).pdf
[9] Karen Chapple and Anastasia Loukaitou-Sideris, White Paper on Anti-Displacement Strategy Effectiveness, February 28, 2021, available at www.urbandisplacement.org/wp-content/uploads/2021/08/19RD018-Anti-Displacement-Strategy-Effectiveness.pdf.
[10] See, e.g. *Price v. City of Stockton*, 394 F. Supp. 2d 1256 (2005)(holding private right of action of federal relocation laws where aggressive code enforcement shut down SROs).

disabilities. Therefore, we also believe it is important to include programs that have the most immediate impact on preventing displacement. "[N]eighborhood stabilization and tenant protection policies have the most direct and immediate effect on mitigating displacement"[11] – this includes a strong local rent stabilization program, including for mobilehome parks. Therefore, as explained below, we urge the City to include such a program in its anti-displacement programs. Given the City's indication that it will create neighborhood action plans in neighborhoods that are susceptible to gentrification, like Little Manila, this is a critical AFFH issue.

C. Legacy of Redlining, Segregation, and Urban Renewal: RECAPS and RCAAs

The discriminatory impacts of Stockton's past redlining endure to this day as well. Redlining is the term for the process that spatially segregated the affluent white population from the predominantly Black and "economically disinvested". The zones were categorized by a color scale, and Green indicated the most affluent and white neighborhoods. While Red, represented the non-white areas. Comparing the 1930s Home Owner's Loan Corporation redlining map to today's demographic makeup proves this segregation persists in modern-day Stockton. The map on the right displays the original Redlining zones within modern-day Stockton boundaries.

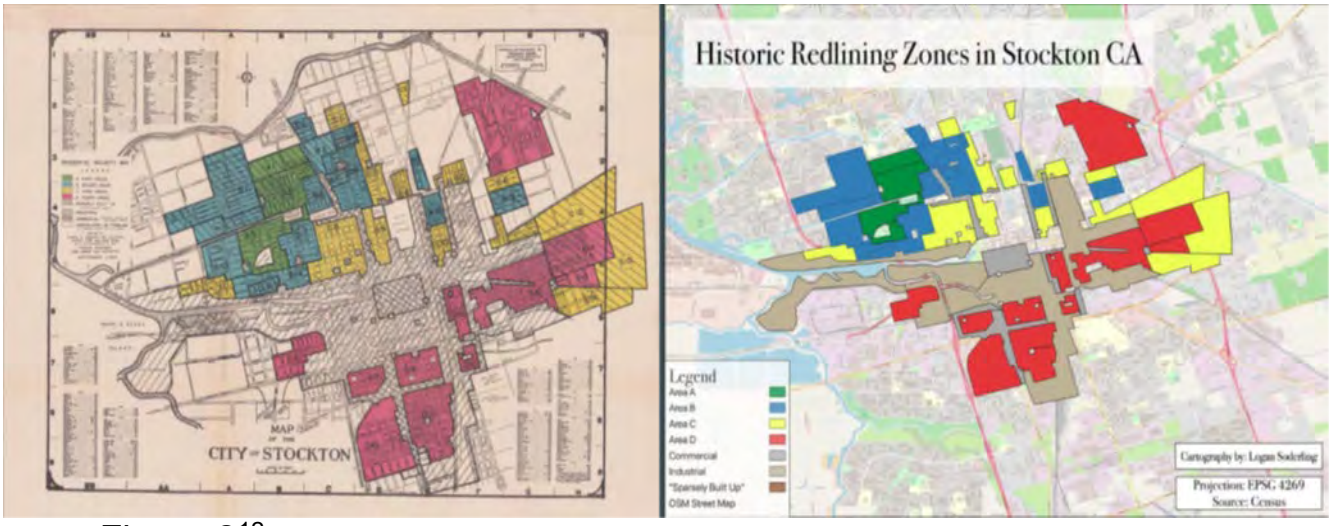


Figure 2[12]

[11] *Id*.

[12] Stockton 6th Cycle Housing Element, UC Berkeley, prepared by Bailey Schweitzer, Weiyang Tang, Joann Martinez (Dec. 2022).

According to AFFH mapping tools by HUD and HCD we see that segregation still exists and has affected housing policies. (See Figure 3).

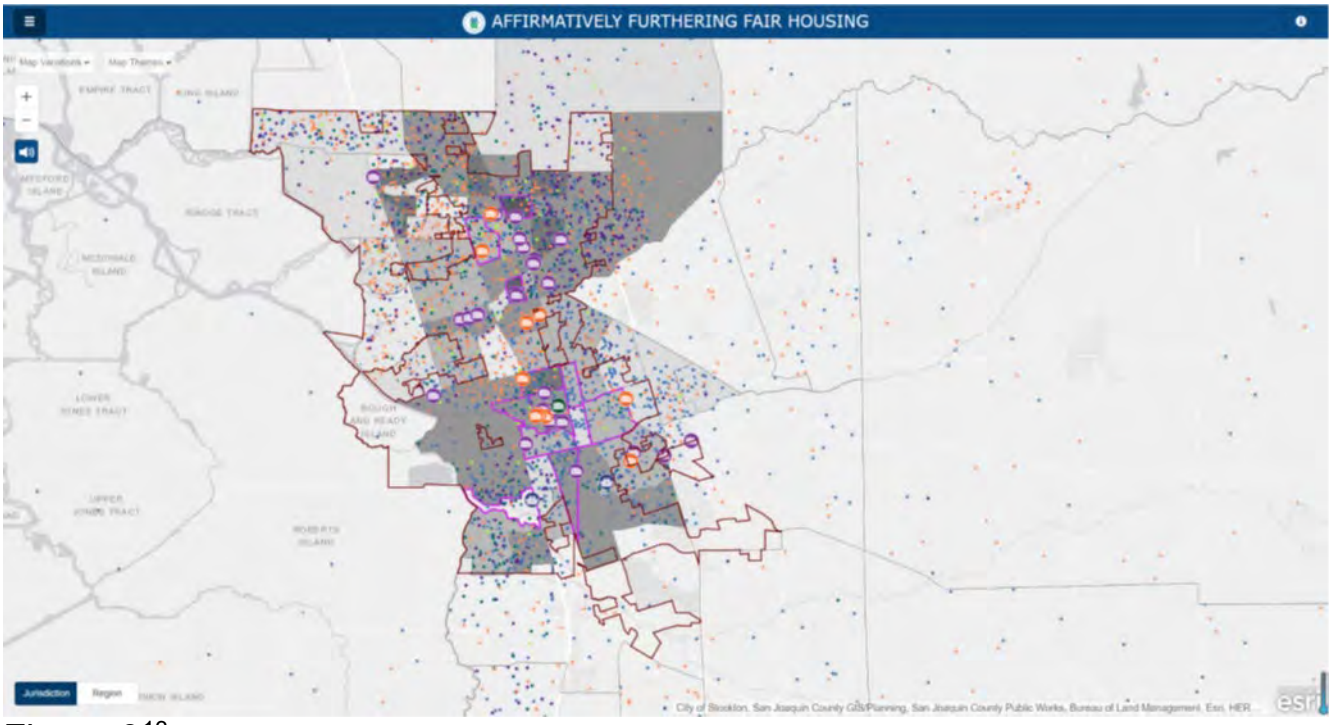


Figure 3[13]

For example, decision makers built a freeway through the Filipino Neighborhood of Little Manila in Downtown Stockton, destroying family homes, businesses, community centers, and much more. Redlining has also excluded many communities of color from homeownership; now over 77% of extremely low income households in San Joaquin County pay over half of their income on rent[14]. We also know that renters of color face the highest rates of cost burden in San Joaquin County[15]. While the City notes that it will work with the housing authority to market vouchers in higher resourced areas, that is not enough to create authentic housing choice. The City should consult with community members to understand better their barriers to housing choice. Further, we understand the Stockton hired consultants to conduct an inclusionary zoning ordinance feasibility analysis, however the results are not included in the current Draft, other than a conclusory statement that such a program is not feasible. The City should at minimum explain why such an ordinance is not feasible in its AFH. The City must also consider how to incentivize affordable housing in RCAAs while also ensuring

[13] *Id.*
[14] California Housing Partnership, Housing Need Dashboard, (May 2023).
[15] *Id.*

that deed-restricted affordable housing will be prioritized in RE/CAPs that are sensitive to displacement risk. The sites inventory does not currently reflect that.

The City also must address how its existing policies contribute to segregation in its Assessment of Fair Housing. For example, it must analyze how the City's policies toward the unhoused (e.g. towing policies, shelter zoning, etc.) exacerbate segregation. A report completed by students at U.C. Berkley and attached here as exhibit A, highlights the historical segregation patterns of Stockton. Unsurprisingly, the majority of unhoused persons in Stockton are Black and Latinx and continue to exist in the segregated areas of Southern Stockton, whether in shelters, the health and human services system, or in the encampments scattered throughout the City's proposed majority RHNA sites.

The Housing Needs Analysis demonstrates that existing low-income renters are living in rent-burdened, overcrowded, and substandard conditions. Indeed, the overwhelming majority of households with the lowest incomes are severely rent-burdened. We encourage the City to account for this disparity when accounting for housing needs. Additionally, when considering resources, the City should identify ones that can be feasibly used. While working with the County housing authority's Section 8 Housing Choice Voucher program is a laudable undertaking, it is unclear how residents could, once they make it to the top of the lengthy waitlist, obtain housing in the City given the already significant overcrowding and unavailability of appropriately sized units. Market rate housing is clearly not meeting the needs of the City's lowest income households, the overwhelming majority of whom are renters.

3. Site Inventory

AB 686 modified Housing Element Law such that a jurisdiction's Assessment of Fair Housing (e.g. segregation & integration, R/ECAP, etc.) should inform the identification of sites in a manner that AFFH. The site identification requirement must assess whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns. Do they transform racially and ethnically concentrated areas of poverty into areas of opportunity?

Stockton's sites inventory is predominantly located in South Stockton. Per SB6 and AB2011, Stockton should consider doing a more in depth review of failing commercial corridors in high resource areas, rather than in places like South Stockton. Comparing the sites inventory to CalEnviroScreen 4.0 indicates

that most of the selected sites are located in the heavily polluted downtown and south of downtown. (See Figure 4).

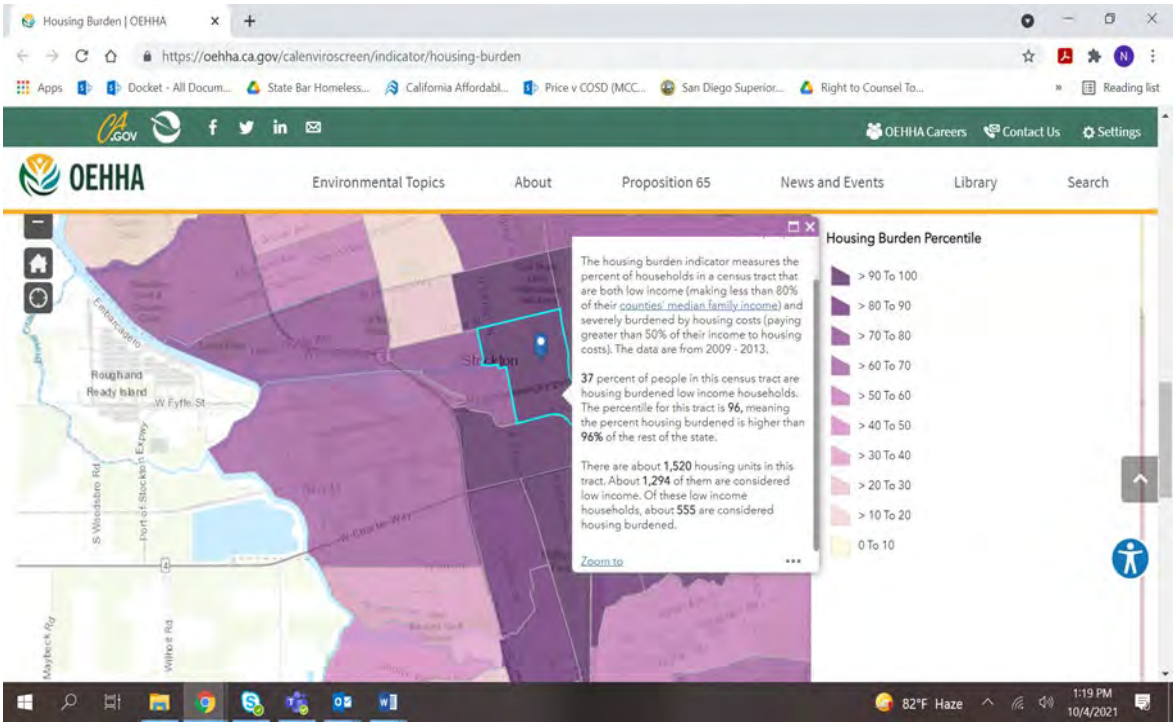


Figure 4: "The housing burden indicator measures the percent of households in the census tract that are both low income (making less than 80% of their counties' median family income) and severely burdened by housing costs (paying greater than 50% of their income to housing costs)…The percentile for this tract is 96, meaning the percent housing burdened is higher than 96% of the rest of the state."

DRC is concerned by the overlap between some of the largest selected parcels and clean-up sites. For instance, the site consisting of parcels 14523013 and 14523012 appear to be the largest selected at just under 40 acres, yet any residential development there would require brownfield mitigation. We commend Stockton for using EPA Brownfield Assessment Grant funds to assess how the city can revitalize current brownfield sites in the city's downtown waterfront. However, the aforementioned parcels are not one such site.

According to the EPA, long-term stewardship of former brownfield sites is costly, and the costs of remediation are unknown prior to a site assessment. This means that building housing atop brownfield sites might be financially unviable without a local financial contribution for brownfield clean-up. If Stockton chooses to include numerous brownfield sites in its RHNA inventory, it must be able to

justify that these sites can be cleaned within the eight-year housing element cycle. Otherwise, the city should exclude these sites from their inventory.

The above 40-acre site also contends with significant air pollutants as it is surrounded by multiple highways, a highway interchange, and abuts a rail line. Therefore, even if a brownfield clean-up is conducted, we believe Stockton should avoid encouraging residential development there. More importantly, surrounding areas are often polluted brownfield sites. So, although residents may not be breathing in toxins from the parcel their apartment is on, they may suffer from pollutants on adjacent sites. As such, focusing affordable housing construction on brownfield sites would be a violation of both AFFH and SB 1000 Environmental Justice Element requirements. Given this, we ask Stockton to avoid heavily relying on brownfield sites to meet Stockton's low income RHNA allocation, without having a plan for remediation in place.

Further, Disability Rights California participated in a site tour of roughly 25 sites in South Stockton on April 12, 2023 to verify this analysis. Consistent across all 25 sites were the proximity to industrial businesses, lack of transportation, lack of grocery stores, closeness to the I5 and 4 freeways i.e. concerns for pollution, and in some areas, lack of sidewalks and proper lighting. Disability Rights California has talked to community members with disabilities and learned how the lack of sidewalks and proper lighting can prevent neighborhood access and access to opportunity, especially when an extremely limited access to food, goods, and services in the area already exists.

4. Identification & Prioritization of Contributing Factors

The housing element must identify and prioritize significant contributing factors to segregation, R/ECAPS, opportunity access, & disproportionate housing needs. A Fair housing contributing factor is a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Contributing factors should be based on all prior AFFH analyses (Outreach, AFH, Site Inventory). Identification and evaluation of contributing factors must: Identify fair housing issues and significant contributing factors; Prioritize contributing factors, giving highest priority to those factors that most limit or deny fair housing choice, access to opportunity, or negatively impact fair housing or civil rights compliance. It must discuss strategic approaches to inform and strongly connect to goals and actions. Goals and actions should stem directly from Contributing Factors. Prioritization is important (4-5 max), and they must be tailored to local conditions.

The City did not complete this portion of the required AFFH analysis. Fair housing contributing factors have been identified by community members. For example, at the May 3, 2020, Stockton Housing Justice Coalition meeting, Stockton residents cited the following: lack of affordable housing for low income residents, low-income people of color segregated to polluted, undesirable locations; widespread housing discrimination on the basis of disability and source of income; lack of transitional housing or other housing opportunities for formerly incarcerated persons; poor quality of existing housing stock; criminalization of the unhoused; and displacement pressures generally. These are all significant contributing factors to segregation, R/ECAPS, opportunity access, and disproportionate housing needs of communities and individuals because of protected characteristics. The City must complete this analysis and prioritization.

5. Goals, Actions/Programs, Metrics and Milestones

While the Draft Element has a broad AFFH program, many of those programs are existing ones, and the City does not lay out metrics and milestones to determine whether its actions are meaningful.

Program 28, "Practices to Affirmatively Further Fair Housing," at H17-H18 of the Draft states that the City will implement the following strategies to affirmatively further fair housing in coordination with the efforts of this action:

- Strategies to facilitate housing mobility/expand affordable housing in high opportunity areas:
    - Programs 6, 10, 12, 13, 15, 24, 25
- Strategies to reduce or prevent displacement/place-based revitalization strategies:
    - Programs 4, 7, 9, 14, 16, 19, 20, 21, 22, 29

The Draft further states that the City will continue to support fair housing monitoring and enforcement.

While the Draft includes raw demographic data and points to some of its Housing Element Programs as furthering fair housing, it fails to assess whether individuals have actual housing choice and does not identify how it will measure whether its programs are making a meaningful impact. After completing such an analysis of housing choice, the City can turn to fashioning appropriate goals and programs. We have made comments on those below, including suggested revisions to those in the draft; however, the City should ensure that it explains how the programs it suggests will AFFH will actually do so, and how they are

connected to the assessment of fair housing. From there, the City must also that include concrete milestones and metrics to evaluate the progress on the programs and fair housing results – otherwise, how will the City know that its programs are meaningfully affirmatively furthering fair housing?

Also, individuals who are chronically homeless, by definition, have a disability; the draft element fails to consider this intersection of needs. Please see below for more comments regarding the City's Homeless Programs.

II. Housing Needs Assessment for People with Special Needs § 65583(a)(7)

The City fails to adequately quantify and analyze the housing needs of people with disabilities. Gov. Code § 65583(a)(7) requires "An analysis of any special housing needs, such as those of the elderly, persons with disabilities, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter."

While the Draft includes a breakdown of the percentage of people with different types of disabilities was provided via U.S. Census data, the census data breaks down disability into only four categories for hearing, vision, independent living, and cognitive. Different types of disabilities require different types of accommodations and modifications in housing, and the residents of the City of Stockton have various combinations of disability, all with their own unique combination of resultant functional limitations possibly needing housing accommodations. Without planning explicitly for accessibility of all kinds, disabled Stocktonians will not have adequate homes to live in. This Draft does not do so and therefore fails to account for every economic segment of the community and is contrary to the duty to AFFH.

The City spends a fair amount of effort discussing people with Intellectual and Developmental Disabilities, which DRC appreciates. The City's Draft also states that "according to the California Department of Developmental Services, as of April 2022, the Valley Mountain Regional Center served 16,443 residents with developmental disabilities in the region and 5,387 residents in Stockton… A significant number of developmentally disabled Stockton residents receiving services from the Valley Mountain Regional Center lived in group home facilities (10.2 percent of adults). Most developmentally disabled individuals lived "at home" (76.8 percent)."

However, the word "at home" is misleading here as what this truly means is that 76.8% live "at home" with their families. Most of these families include aging

parents from the baby boomer generation with children with I/DD, putting those children at risk of homelessness when their family members pass, as their SSI is not sufficient to afford market rate housing. And because they have been living with family, they will not have any other benefits established. Indeed, the City acknowledges in its Draft that "many persons with disabilities rely solely on Social Security Income, which is insufficient for market rate housing." Draft at BR-32. A significant portion of this 76.8% of those being served by the Regional Center could live independently, but for any affordable, accessible, safe, inclusive and non-segregated housing options.[16]

In addition, per the City's own data, a rather shocking statistic coming out of U.S. Census shows that in Stockton, among school age children, nearly half (48.6 percent) have a "cognitive impairment." For persons with disabilities ages 18 to 64 years, 27.4 percent have trouble walking, 23.2 percent have cognitive impairments, and 20.8 percent have difficulty with independent living.

Many people with mental health disabilities require supportive services to maintain stable housing. The City should separately analyze the housing needs of people with mental health disabilities and create programs to specifically address those needs. Those needs include: supportive housing, crisis housing, shared housing, and other innovative housing models. Without addressing this issue, people too often cycle between houselessness and institutionalization.

Further, there is no discussion of the unique needs of Blind residents, or those of Deaf residents.

In addition, the City should recognize that people who are homeless are by definition people with disabilities for their analysis of special populations. Those who are formerly incarcerated face incredible barriers to housing in Stockton as they face criminal background checks for rental housing, credit checks. and a myriad of other barriers. People who are formerly incarcerated are mostly people of color and people with disabilities and Stockton's Housing Element Draft does not account for the housing needs of this special population. As such, it is also not AFFH.

The Draft states, "[t]he unhoused are a fair housing concern, and it is often difficult to collect informative data that accurately reflects the magnitude of the

[16] Two reports attempt to assess the housing needs of people with intellectual/developmental disabilities, despite a dearth of accurate data: https://scdd.ca.gov/wp-content/uploads/sites/33/2018/12/STATEWIDE-STRATEGIC-FRAMEWORK-FOR-EXPANDING-HOUSING-OPPORTUNITIES-FOR-PEOPLE-WITH-INTELLECTUAL-AND-DEVELOPMENTAL-DISABILITIES-10.16.pdf and

population at risk, resulting in undercounting." The data source the City uses is a Point-in-Time count led by the San Joaquin County Community Development Department and the Central Valley Low Income Housing Corporation in late January 2022. The City estimates it has "921 persons without nighttime shelter as of the 2022 Point-in-Time (PIT) Count. The size of shelters in Stockton is based on building and fire code allowances and there is no maximum number of beds." The City's analysis is as follows:

> Government Code Section 65583(a)(4)(I) requires a minimum of 200 square feet per person to meet the unsheltered need. To address the unsheltered needs of 921 people, this would be a minimum of 184,200 square feet or 4.2 acres. The 21 vacant parcels in the IL, IG, and PF districts range in size from 0.11 to 5.11 acres. Therefore, there are sufficient sites in the city to address the potential need for emergency shelters to accommodate 921 unsheltered persons experiencing homelessness.

However, the total number of homeless people living in the City is admitted to be undercounted. According to Community Based Organizations working with homeless in the many encampments in Stockton, the number is closer to 5,000 people who may need emergency shelter on any given night. Additionally, Stocktonians experienced extreme flooding and heat waves in 2022 which have resulted in increased homelessness. The City states in the draft that "[wh]ile the results suggest there has been an increase in the number of unsheltered homeless, the increase may also be a result of a more complete and rigorous unsheltered count." However, DRC participated in the 2022 Point-in-Time Count and observed various issues with the City's methodology for counting people experiencing homelessness in the City. The City chose to allot only one day to conduct a PIT count for Stockton—the largest city in San Joaquin County, and conducted the entire count for approximately no more than six hours total. Further, even if a person had no home or a regular place to sleep, the City instructed volunteers not to count someone as experiencing homelessness if they had not slept on the street the night before the PIT count. This approach and methodology surely resulted in a low count. Inaccurate counts of those experiencing homelessness stand to hamper the City's efforts to end homelessness and likely decrease the ability to get appropriate funding from state, federal, and philanthropic sources. Data from, for example, the school district, could help supplement the PIT data to create a fuller picture of the number of unhoused in Stockton.

The City must also make diligent efforts to evaluate the level to which its shelters and transitional housing present barriers for people with disabilities. For instance, many people with disabilities cannot access housing without reasonable accommodations (e.g. emotional support animals or other policy changes to strict rules) or reasonable modifications (e.g. grab bars installed or other physical accessibility changes). In our outreach to unhoused community members, we have encountered many who cannot access congregate settings like shelters or transitional housing in Stockton due to lack of accommodations for their disability, or because a shelter environment just cannot work for them (e.g. people with significant mental health conditions, or people with autoimmune diseases).

In our work, we often hear from municipalities that they have put policies in place to account for the needs of people with disabilities, and that they expect their contractors and employees to follow those policies and the relevant laws. However, in our experience, such an approach is not enough to actively prevent harm to people with disabilities. There must be a proactive and continued effort made to assess barriers, implement a plan to address identified barriers, and ongoing training and technical assistance. Without these additional steps, we have found that many people with disabilities will continue to be locked out of suitable shelter and/or housing opportunities, thus continuing the homelessness cycle. The difficult truth is that for some people, living on the streets feels better for them and their disabilities than residing in a shelter or transitional housing environment. The shared goal for us all is to ensure that people are not made to feel this way. And, lastly, the City's numbers must include people who are not technically homeless, but who cycle through homelessness and institutions regularly, such as those with mental health disabilities, and formerly incarcerated populations.

III. Programs

Overall, DRC is pleased with the City's goals to create more housing for all income levels and for special populations. However, the quantified objectives articulated for each program do not match the actual needs according to the City's own analysis and data. As an overall comment, policies refer to a Housing Action Plan (e.g. Goal HE-1 and Policy HE1.13, Program), but the policies guiding that plan are not incorporated into this Housing Element, and should be included in the Draft to ensure that they are consistent.

A. Program 15. Development Code Revisions

Currently the zoning code defines supportive housing in Municipal Code section 16.240.020 and indicates that it is a permitted use by right in special purposes or commercial zones. The zoning code must be amended to allow supportive housing by right in all zones where multi-family and mixed uses are permitted. Government Code section 65583(c)(3). This is in addition to the requirement that transitional housing and supportive housing shall be considered a residential use subject only to the same restrictions that apply to other residential units of the same type in the same zone. *Id*.

B. Program 21. Code Enforcement Program

This program states the City shall continue to inspect housing units in "targeted areas" to check for building code violations. In situations where properties cannot be rehabilitated, the City will "continue to enforce the removal and replacement of substandard units." Here, 2,000 units annually is the quantifiable objective and completed via the "Police Department: Neighborhood Services Division", which houses code enforcement. DRC actively engages in frequent, ongoing conversations with Stocktonians who are unhoused, renting, people of color, and people with disabilities. Conditions of the current housing stock in Stockton are a major concern.

To better address this major concern, we recommend that the City commit to moving from a complaint-based code enforcement system to a proactive one, and one that includes tenant protections to prevent displacement (see displacement discussion above). This could include creating a rent escrow account program as well as engaging in proactive inspection. We can provide sample programs if needed.

Concerningly, Policy 4.4, which cross-references Program 21, states that the City will continue to implement a Crime Free Multi-Family Housing Program. *HCD's AB 686 Guidance* explicitly recognizes such programs as barriers to AFFH. Such programs most often serve to discriminate against Black and Latinx households, disabled people, and domestic violence survivors.[17] The City should identify this program as a barrier to AFFH and create a program to remove it. Similarly, given the barriers to reentry faced by people leaving institutions

[17] See Liam Dillon, Ben Poston, Julia Barrajas, Black and Latino renters face eviction, exclusion amid police crackdowns in California, Los Angeles Times, November 19, 2020, available at https://www.latimes.com/homeless-housing/story/2020-11-19/california-housing-policies-hurt-black-latino-renters; See also, e.g. Alisha Jarwala & Sejal Singh, When Disability is a "Nuisance": How Chronic Nuisance Ordinances Push Residents with Disabilities Out of Their Homes, Harvard Civil Rights-Civil Liberties Law Review, Vol. 54, Page 875, available at https://harvardcrcl.org/wp-content/uploads/sites/10/2019/07/54.2-Jarwala-Singh.pdf

including jail and prison, Code Enforcement should not be housed in the City's Police Department, so as to ensure that residents can work proactively with Code Enforcement.

C. Program 24. Continue to Assist the Disabled in Community Development Block Grant Project Areas.

DRC is pleased with Program 24: The City shall continue to include special provisions for housing the disabled in CDBG project areas, including mobility grants for homes (e.g., Emergency Repair Program) and accessibility features for 120 low-income individuals and households in Stockton, including rental units for owners of 4 or fewer rental units. Will the program be available to renters? If not, the City should identify funds to expand the program to renters who need modifications to make their unit accessible. This would also allow older adults to age in place.

D. Program 25. Universal Design

We support the City's Program 25, but note that while universal housing design is an important, the Housing Element should be clear that universal design is not synonymous with full accessibility; the needs, goals, and programs should clarify that the City will encourage both. The City should inventory the amount of its housing stock that is accessible and affordable to people with vision and/or mobility impairments. If the City cannot track these, it should include a program to monitor and track such units, and to make such information available to the public. The City should also make its list of affordable units available to the public. As part of this program, the City should include enforcement of existing accessibility standards. Local governments can affirmatively further fair housing by ensuring that Code Enforcement staff understand accessibility standards and are enforcing those laws.

E. Program 27. Addressing the Needs of Those with Disabilities

As outlined above, Stockton is home to a large number of people with disabilities, including low-income people of color with disabilities. However, the City's programs address only a small portion of their housing needs. After the City identifies the needs of people with mental health and sensory disabilities, in addition to mobility and I/DD, it should include specific information on how to address their needs in this program.

a. Intellectual/Developmental Disabilities

The City says is will continue to work with the Valley Mountain Regional Center to implement an outreach program that informs families in the city about housing and services available for persons with developmental disabilities. However, the "quantified objectives" for this program are described as "N/A." Draft pg. HE-17. This is unacceptable. Senate Bill 812 mandates a discussion of potential housing resources for people with I/DD and this is absent from the Draft.

People living with a developmental disability can live in various types of housing, and often face a lack of truly integrated, community-based options. Such options include:

- Rent-subsidized affordable housing, with services if necessary, accessible, close to transit and community[18]
- Section 8 Apartment/Housing Choice Voucher with housing navigation supports. Few regional centers contract with housing navigators – but people with specialized training to help place individuals in housing can be critical.

The City should also ensure that the Housing Authority is complying with the obligation to exclude IHSS income of family members serving as caregivers when it calculates household income. Overall, individuals with I/DD should have choice to live in the most integrated, non-segregated settings possible. Only when absolutely necessary, the following may also be appropriate: Licensed and unlicensed Single Family homes, modified, of 3-5 bedrooms, or housing specially modified for the Medically Fragile (SB 962 Homes)

b. Reasonable Accommodation Ordinance

We appreciate that the City will amend Chapter 16.214 of its Municipal Code, pertaining to reasonable accommodations. We support that Program 27 proposes to remove two of the findings that are part of the City's Reasonable Accommodation approval process for consistency with State law: (1) whether the requested reasonable accommodation adequately considers the physical attributes of the property and structures, and (2) whether alternative reasonable accommodations could provide an equivalent level of benefit. DRC would like to state this change should be made immediately. However, additional changes are needed to bring the ordinance into compliance with state law. We urge the program include a commitment to make the following changes:

[18] For an example of integrated, disability-forward housing models for people with I/DD, see https://thekelsey.org/.

- Section 16.214.030 Definitions: "'Individual with a disability'" means any person who has a medical condition, physical disability, or mental disability that substantially limits one (1) or more of the person's major life activities, as those terms are defined in the Acts." The City's definition here aligns with the federal, but not the state definition of disability. To comply with Government Code § Gov. Code §12926.1(c), the City must strike the word "substantially". The City should also include complete definition of disability: The Act protects any of the following: an individual with a physical or mental impairment that limits one or more major life activities; anyone who is regarded as having any such impairment; or anyone who has a record of having such an impairment.
  Individuals in recovery from drug or alcohol abuse are protected by federal and state fair housing laws. However, individuals currently using illegal substances are not protected under the law, unless they have a separate disability.
- The protections afforded people with disabilities under federal and state fair housing laws extend to those who are associated with them, including providers and developers of housing for people with disabilities.
- Section 16.214.060 Application Filing: A provision should be made to ensure confidentiality of the person with a disability's contact and medical information. Further, this section should make clear that not only may a person with a disability file an application, but also an organization serving people with disabilities (e.g. sober living homes, transitional or supportive housing for people with disabilities, etc.)
- Section 16.214.070 Review and Processing: Reasonable accommodation requests do not require that the City notify neighbors of the request. Such notification will in most circumstances, invade the applicant's privacy rights, or possibly result in discriminatory or not-in-my-backyard behavior. This requirement should be removed, both to ensure meaningful access to the City's land use and zoning programs under the ADA and to affirmatively further fair housing under AB 686 and the Fair Housing Act.
- Section 16.214.080 Findings and Decision: We recommend that the City add a clause making clear that if the request is denied because it would impose an undue financial and administrative burden on the County and/or would require a fundamental alteration to the zoning or building laws, policies or procedures of the County, the Director or their designee must engage in an interactive process with the person seeking the accommodation to determine if there is another reasonable accommodation that may provide an equivalent level of benefit.

- Section 16.214.090 Appeals: We recommend that appeals are directed to the City Manager in consultation with the ADA Coordinator, in order to ensure confidentiality.

F. Program 23. Continue to Support Organizations Assisting Homeless Persons

Program 23 seeks to increase shelter and transitional facilities and provide short term financial assistance for households at risk of becoming homeless, however, exactly how this would work is not defined. Program 23 states:

> "The City shall annually apply for and continue to pursue State and federal funds available to the City, private donations, and volunteer assistance to support homeless shelters. The City shall continue to provide financial assistance from its Emergency Solutions Grant (ESG) funding to homeless service providers and continue to support additional development of shelter facilities *as requested by shelter providers*. In addition, the City shall review the need for additional shelter facilities and services when it updates its Consolidated Plan." [emphasis added]

First, under the Housing Element, the City must plan for all economic segments of the community and that includes those with little to zero income; it includes homeless people. So, to say the City will "support" additional development of shelter facilities, but only "as requested by shelter providers," is not a proper metric to AFFH or substantiate a meaningful program to address the actual needs findings. Further, in order to end homelessness, emergency shelters and even transitional housing cannot continue to be the City's primary mode of addressing the issue.

Under Program 23, the City aims to assist up to 2,000 unduplicated homeless persons; and 1,000 households at-risk of homelessness with limited-term rental assistance or utility payments. As part of this, the City will increase the number of board and care or other types of residential or transitional care facilities for vulnerable populations by 300-500 beds. DRC opposes increasing the use of institutional-type settings to house people, which often includes board and cares. Through our role as the state's Protection and Advocacy agency, we hear about such institutional conditions from clients and stakeholders. Housing options should be community-based, allow for freedom to come and go, and not have onerous rules.

G. Additional Program Recommendations

As explained above, the City's AFFH analysis indicates that programs are needed in the following areas: tenant protections to mitigate displacement, environmental justice, and programs to increase opportunities to preserve affordability via innovating community ownership models.

The City's Housing Element programs do not address tenant protections – which are critical to ensuring that existing residents can continue to live in their homes. Moreover, community members have identified such protections as a major issue. For example, the Stockton Housing Justice Coalition held an event on May 3, 2020 in which a tenant bill of rights, right to counsel, strong just cause protections, and universal income for renters were indicated as needed policies. Further, ending tenant harassment and discrimination as well as rent stabilization policies are also critical to mitigating displacement. We urge the City to include a tenant protection program committing to the creation of such policies.

With regard to environmental justice, the City should both ensure a dispersal of sites so that neighborhoods with the highest pollution burdens are not the location of most future building, while also creating a remediation program to seek funding for site remediation. The City should also include EJ policies that specifically address the needs of the elderly, people with disabilities, and people with chronic respiratory conditions including establishing a program to distribute air conditioning to these vulnerable populations. For example, the City could identify sources of funds that prioritize elderly residents and residents with disabilities access to in-home HEPA air filters at little or no costs. Furthermore, the City should explore an EJ policy, similar to Los Angeles County's Green Zones Ordinance, to create air pollution buffers to prevent the future zoning of residences, schools, childcare facilities, elderly care facilities, parks, and health care facilities away from heavy industrial areas.

In addition to these recommendations, community members have identified others that the City should consider. For example, at the May 3, 2020, Stockton Housing Justice Coalition community meeting, City residents suggested: a renters' right to counsel; adoption of a tenants' bill of rights; repurposing vacant buildings, e.g., those downtown, for affordable housing; the City's acquisition of land for development of lower income housing; extending just cause eviction protections to single family homes; and universal basic income for renters. These are all appropriate and valid program considerations for the housing element that would also affirmatively further fair housing.

Increasingly, jurisdictions are creating programs to preserve affordability through community-based models such as promoting community land trusts, developing tenant opportunity to purchase ordinances, and land banking. We urge Stockton to do the same in order to create long-term community-led affordability.

IV. Conclusion

DRC submits these initial comments and recommendations, but plans to supplement these in the coming weeks. Please reach out to DRC at (619)814-8501 if we can be of any assistance as the Planning Department considers these recommendations and comments.

Thanks,



Nichole Mendoza
Senior Attorney
Civil Rights Practice Group
Disability Rights California

Attachment A

Stockton 6th Cycle Housing Element

Bailey Schweitzer, Weiyang Tang, Joann Martinez

Table of contents

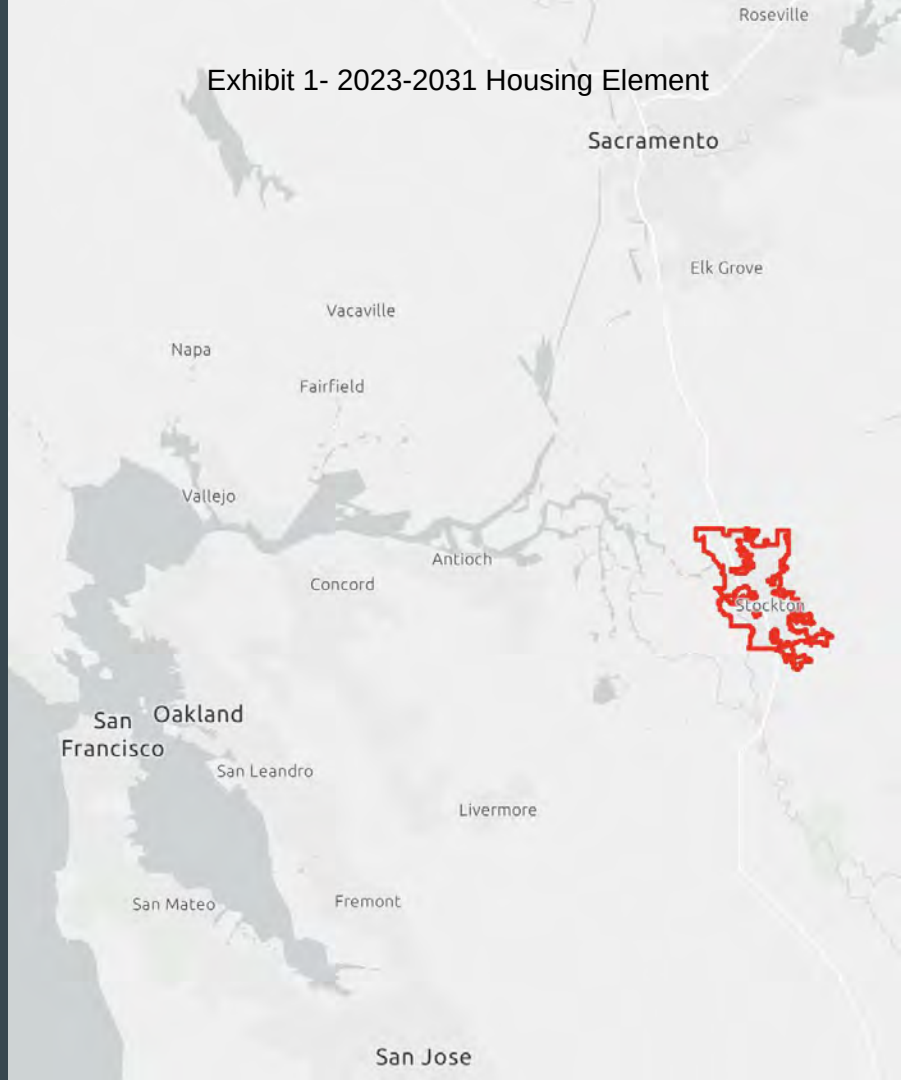
1. Overview of Stockton
2. Stockton's Housing Element Timeline & RHNA Allocation
3. Alleviating Patterns of Racial and Income Segregation
4. Overlapping RHNA Inventory and Polluted Neighborhoods
5. Commercial Zoning
6. Summary
7. Recommendations

Overview of Stockton, CA

- Medium-sized city of 322,000
- Located in the Central Valley, 80mi east of Berkeley
- Racially diverse - plurality Latinx
- Median HH income of $58,393

Source: US Census

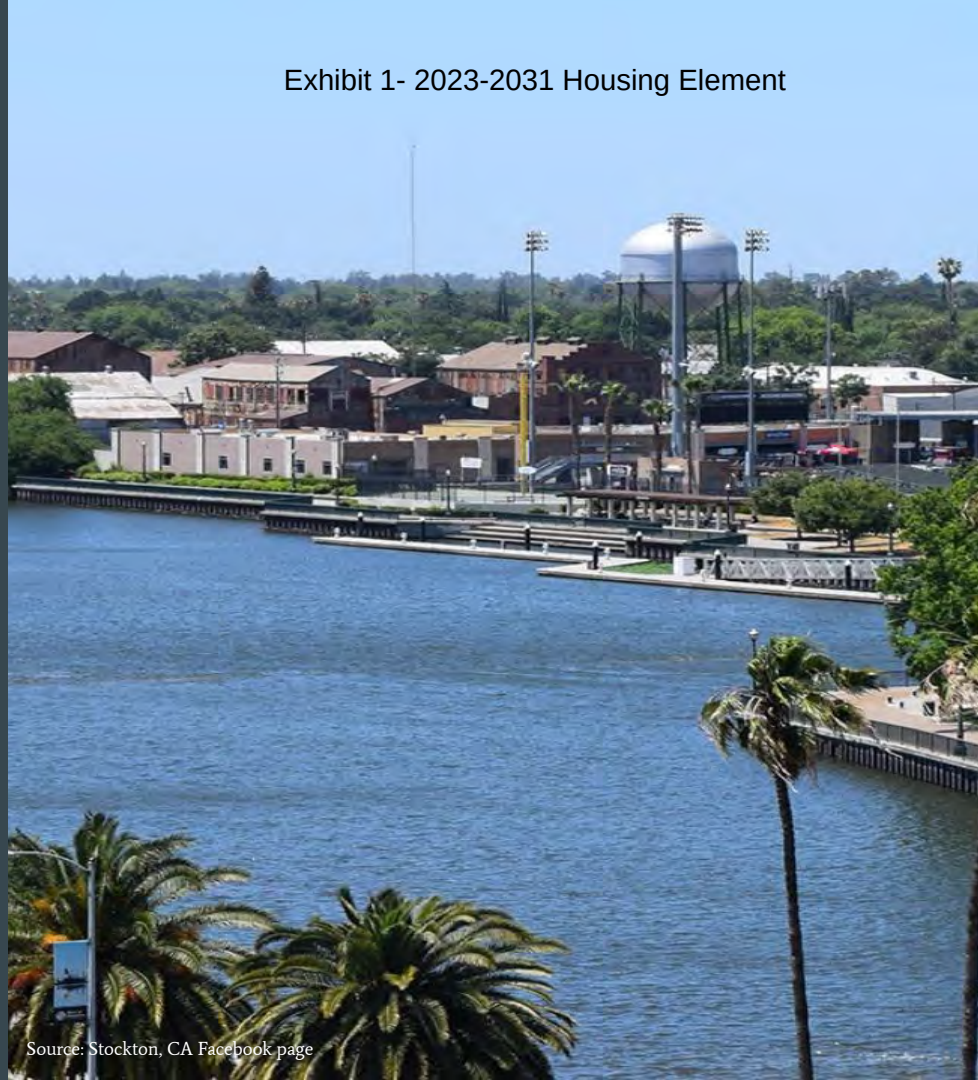
Exhibit 1- 2023-2031 Housing Element



Housing Market Conditions

- 50% owner-occupied
- 72% single family
- Despite a significantly more affordable housing market than CA, it has similar levels of housing burden

Source: Stockton's 5th Cycle Housing Element



Source: Stockton, CA Facebook page

Stockton's 6th Cycle Housing Element Timeline

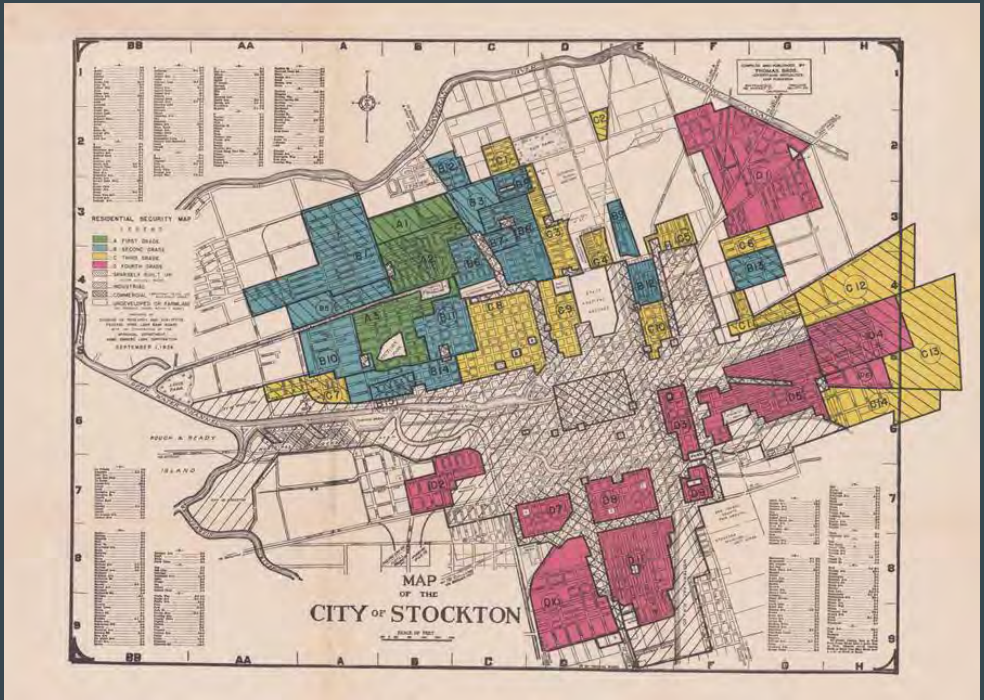
- Stockton's 6th Cycle Housing Element isn't due to HCD until December 2023
- As of December 2022, they released a preliminary map of RHNA sites
- Focused on advising the city on how to create a compliant housing element that **affirmatively furthers fair housing** per AB 686

Draft Housing Element Sites Inventory

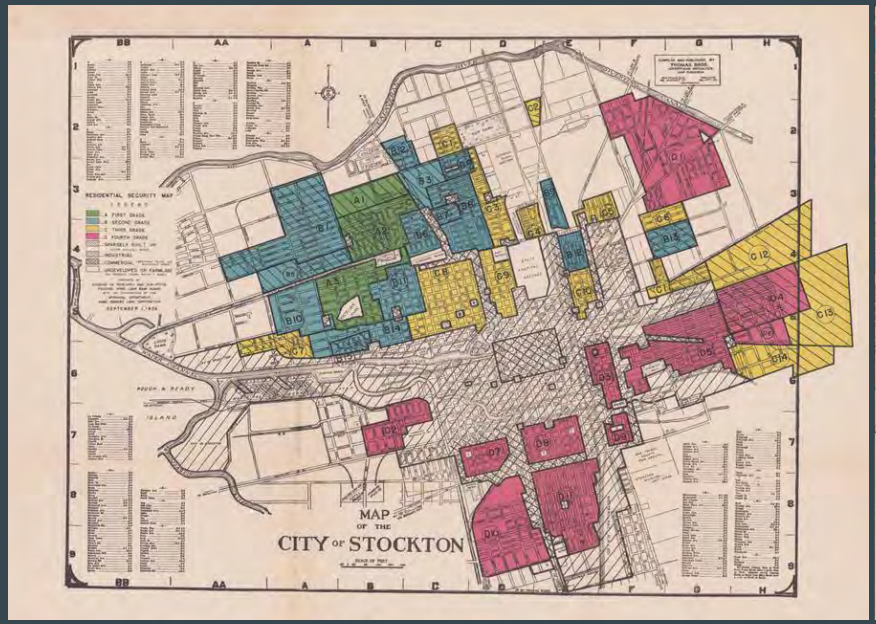
Income Group	RHNA	Entitled Projects	Sites*	Total Capacity	Surplus
Lower Income (<80% AMI)	4,013	0	5,273	5,273	1,260
Moderate Income (81%-120% of Median Income)	2,587	2,050	2,193	4,243	1,656
Above Moderate Income (>120% of Median Income)	6,072	11,620	2,177	13,797	7,725
TOTAL	12,672	13,670	9,643	23,313	10,641

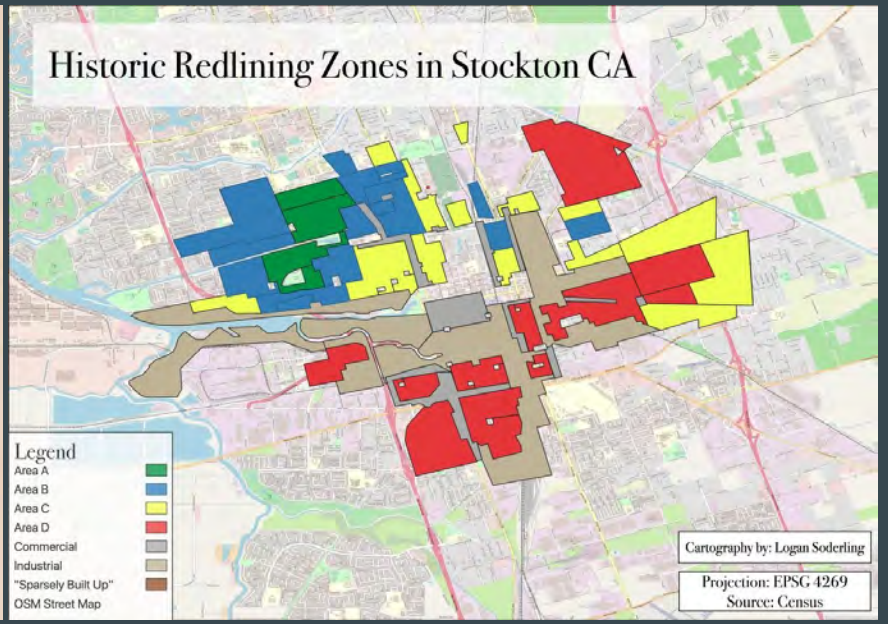
*573 acres

Alleviating Patterns of Racial and Income Segregation

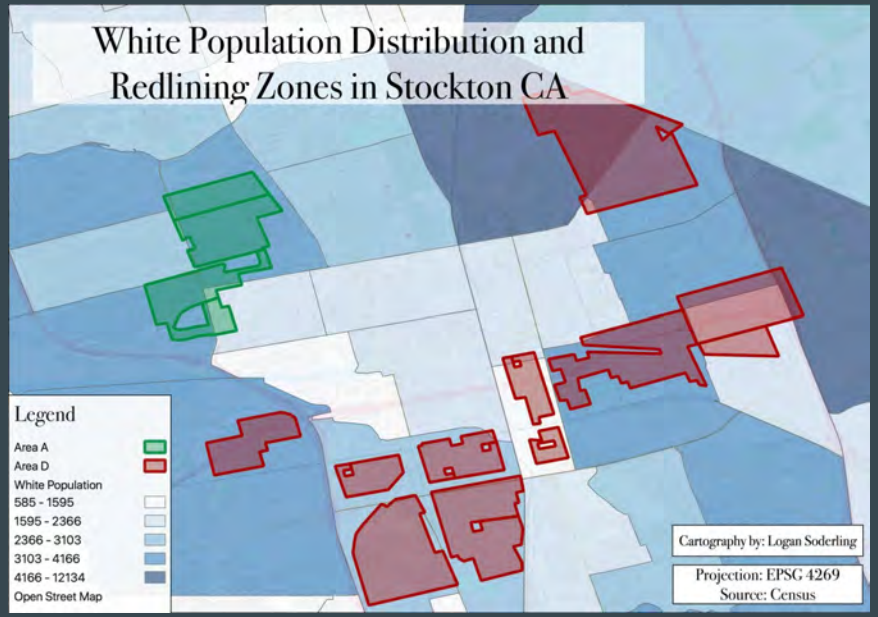


Alleviating Patterns of Racial and Income Segregation

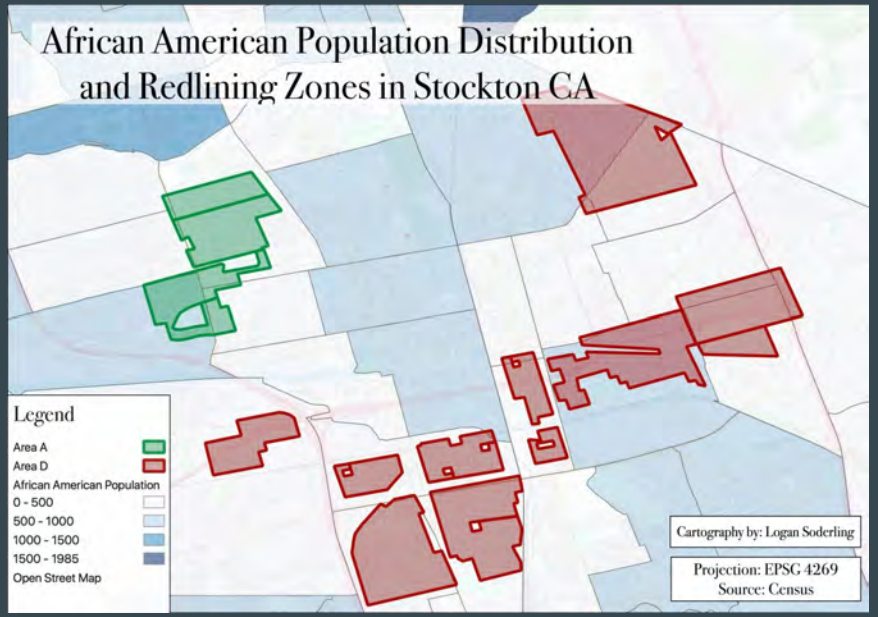




Redlining Archives of California's Exclusionary Spaces:

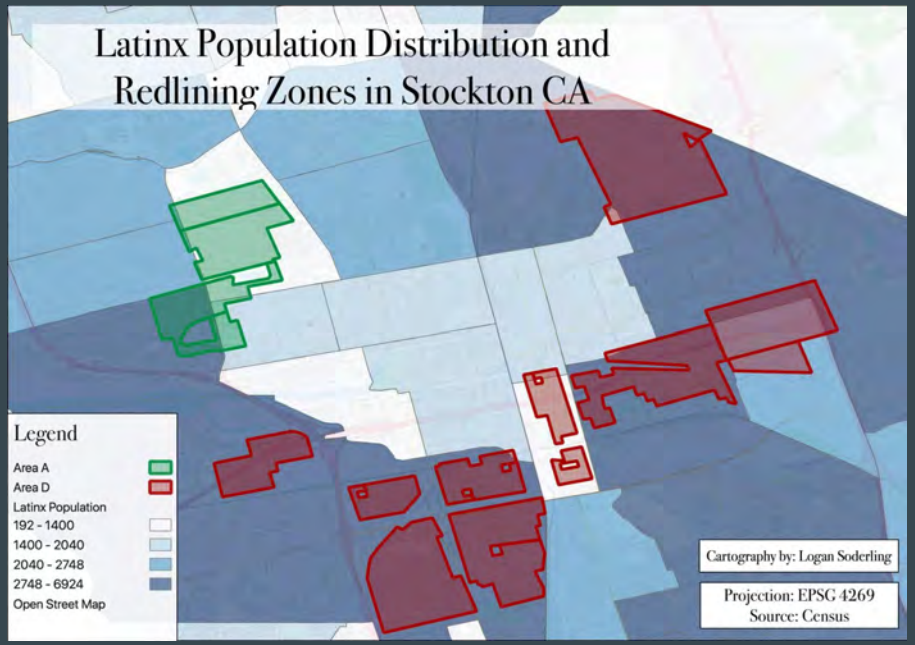


White Pop. and Redlining



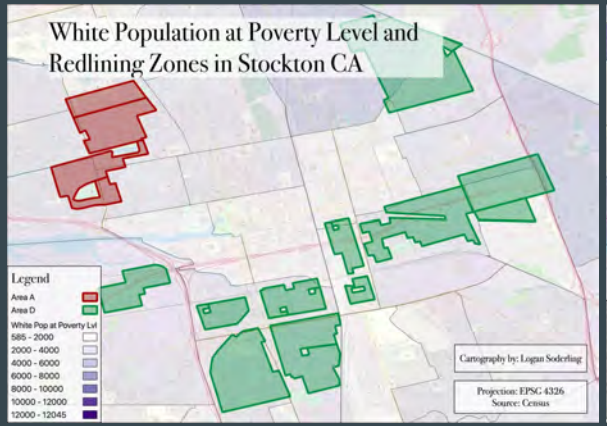
African American Pop. and Redlining

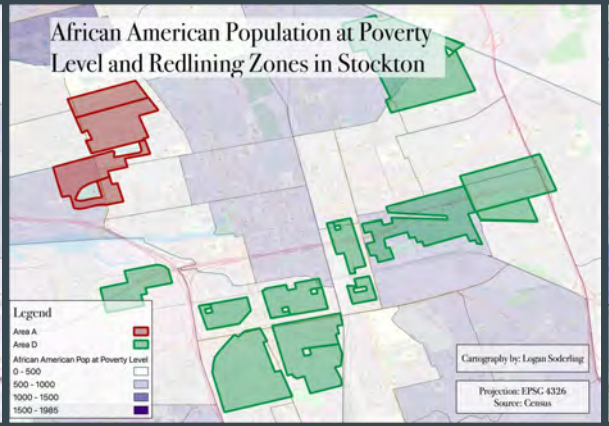
Redlining Archives of California's Exclusionary Spaces:

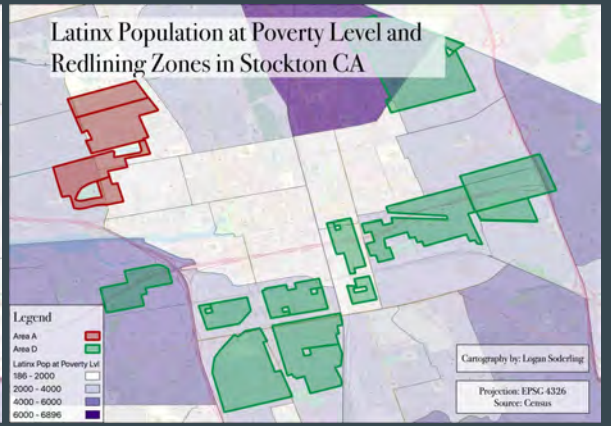


Latino Pop. and Redlining

Redlining Archives of California's Exclusionary Spaces:

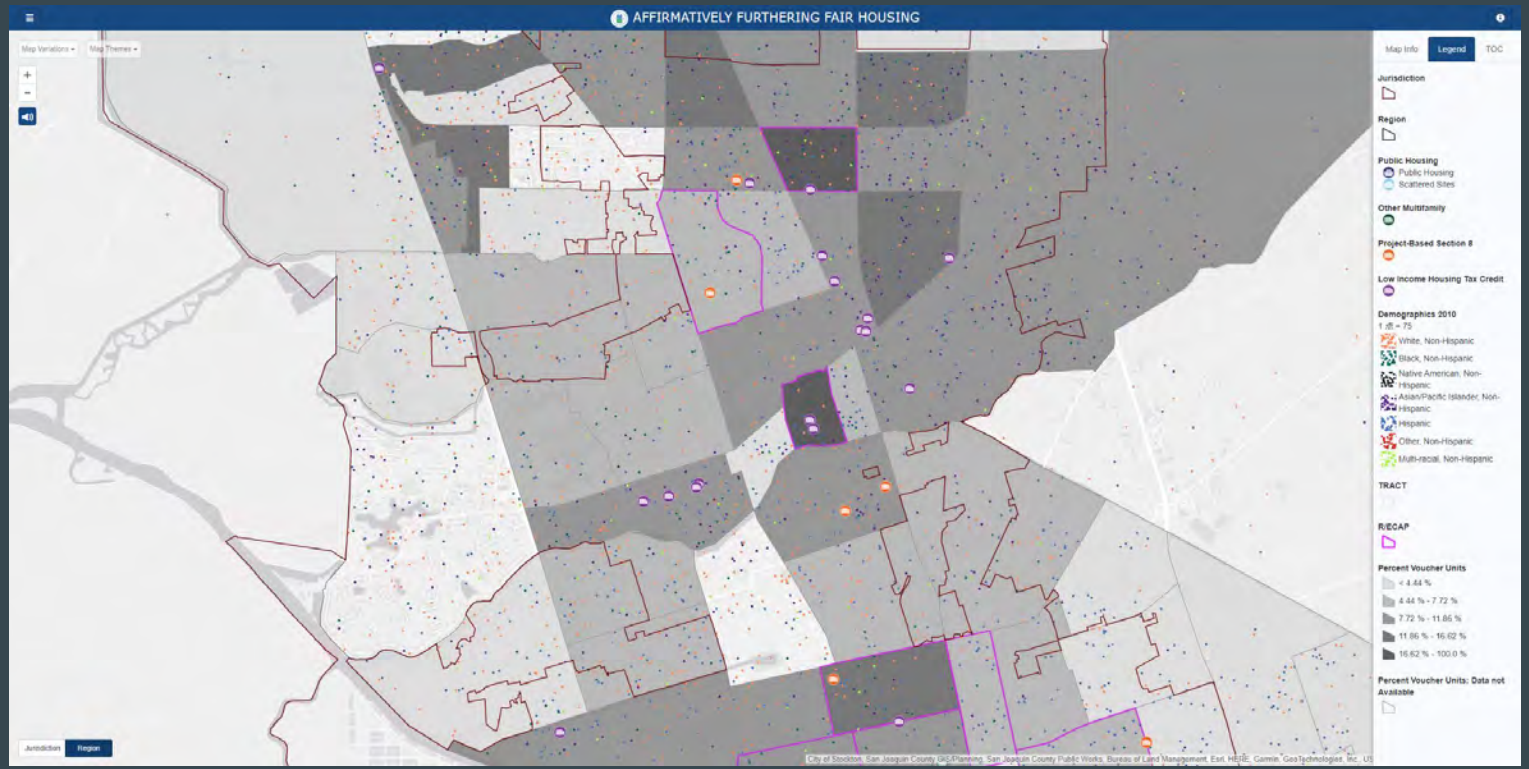






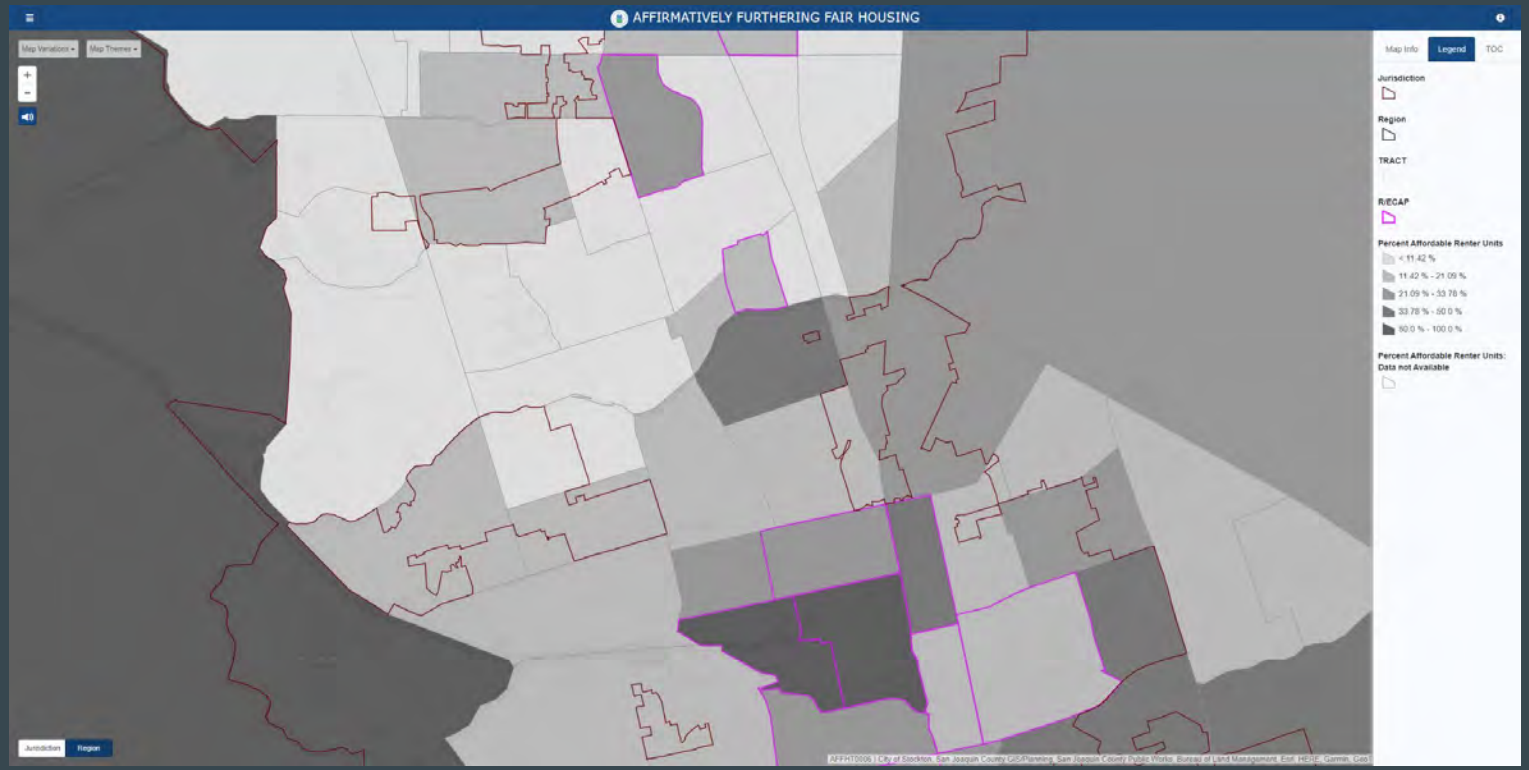
Race Poverty and Redlining

AFFH Data From HUD



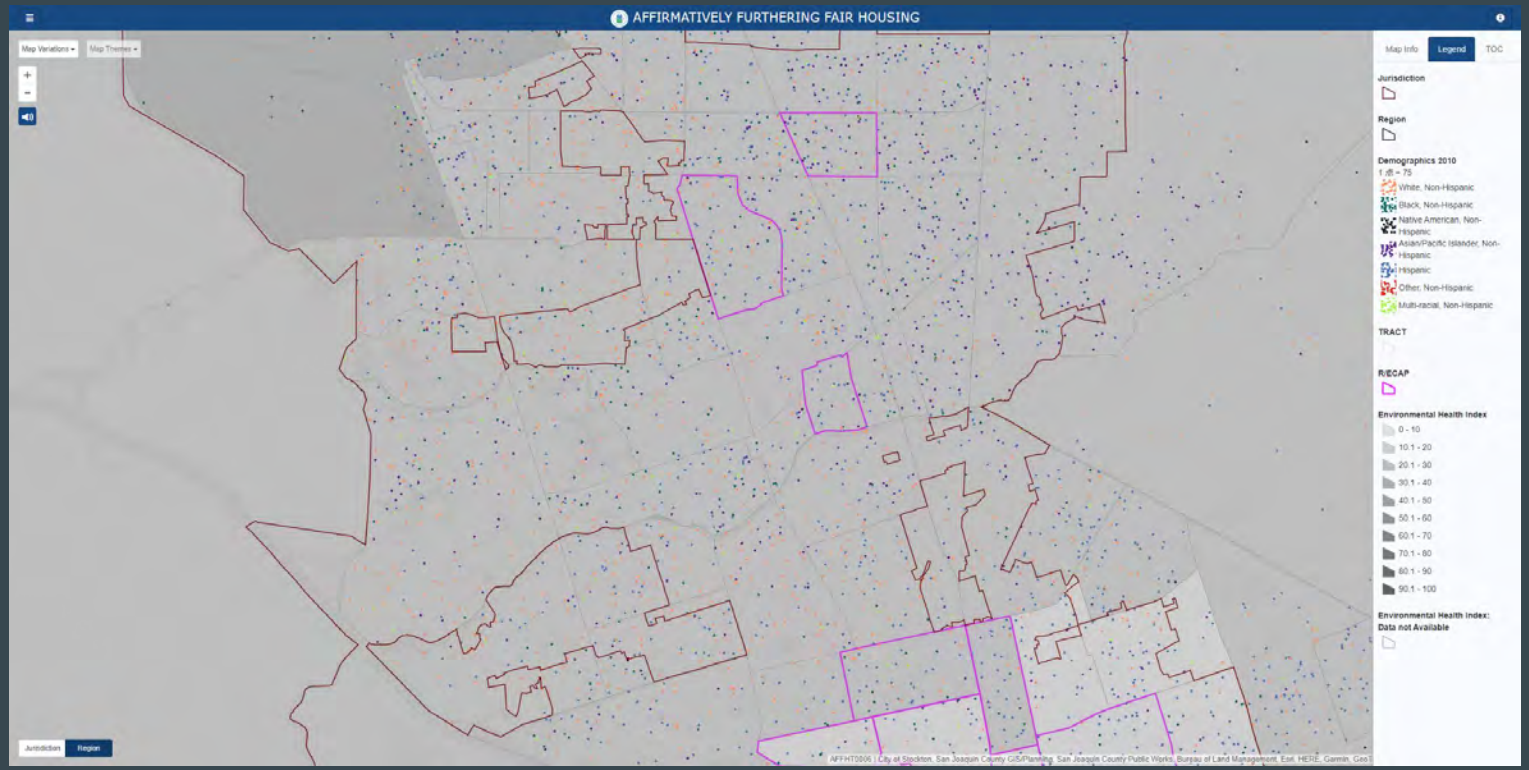
Publicly Supported Housing and Race/Ethnicity

AFFH Data From HUD



Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

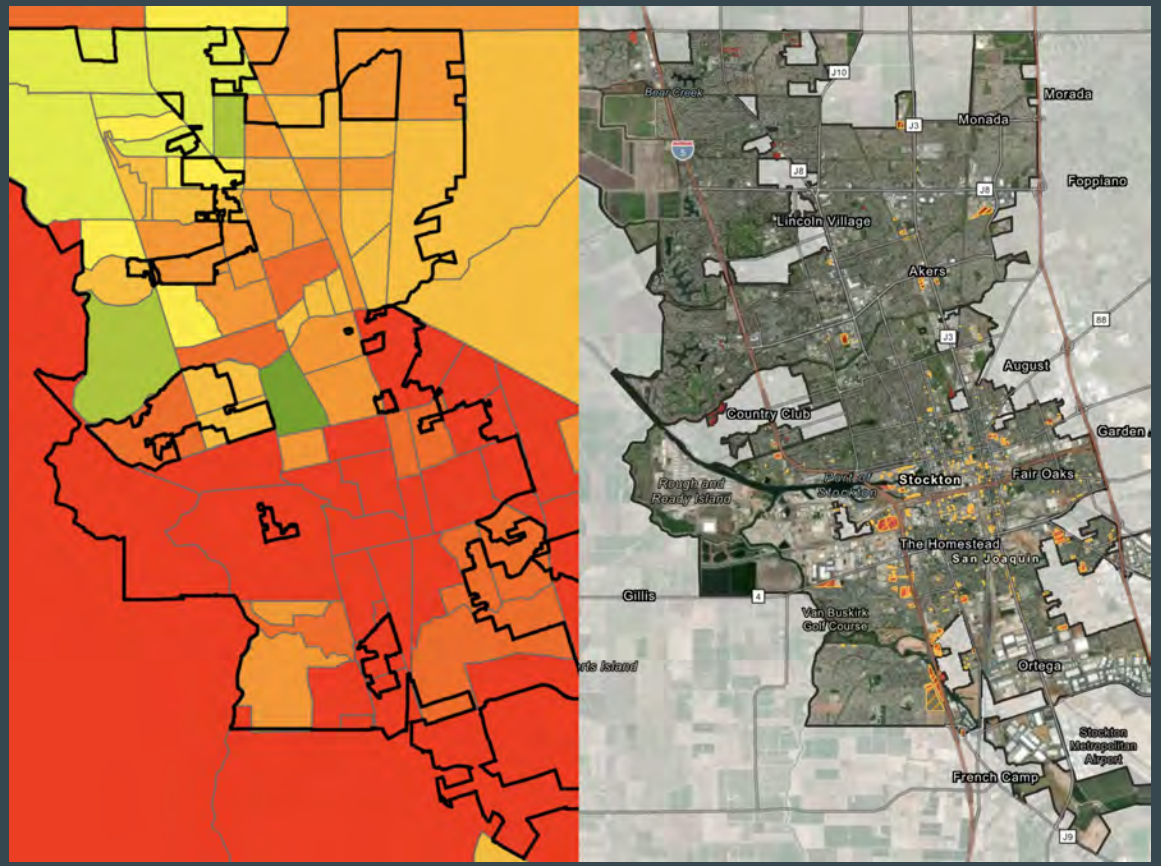
AFFH Data From HUD



Demographics and Environmental Health

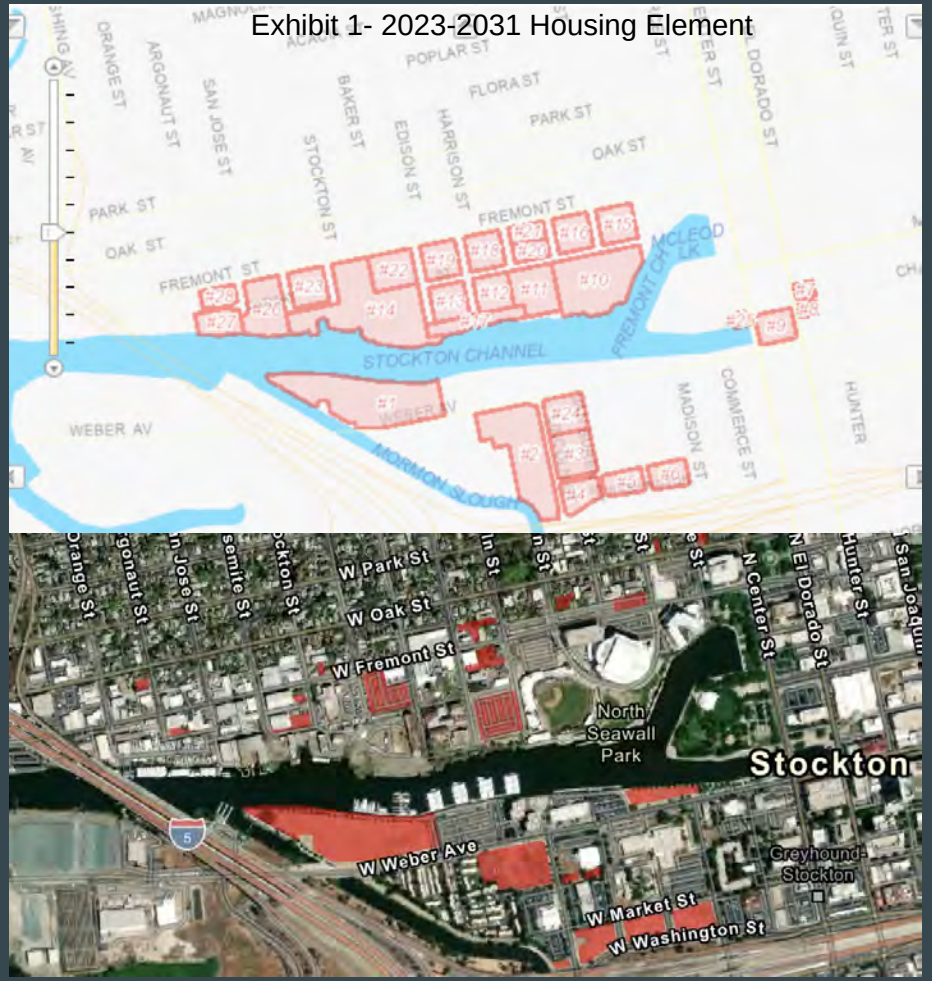
RHNA Site Selection and Polluted Neighborhoods

- Most sites are located in neighborhoods CalEnviroScreen 4.0 considers heavily polluted and highly disadvantaged
- Unclear number of units they expect for selected sites



Stockton Brownfields

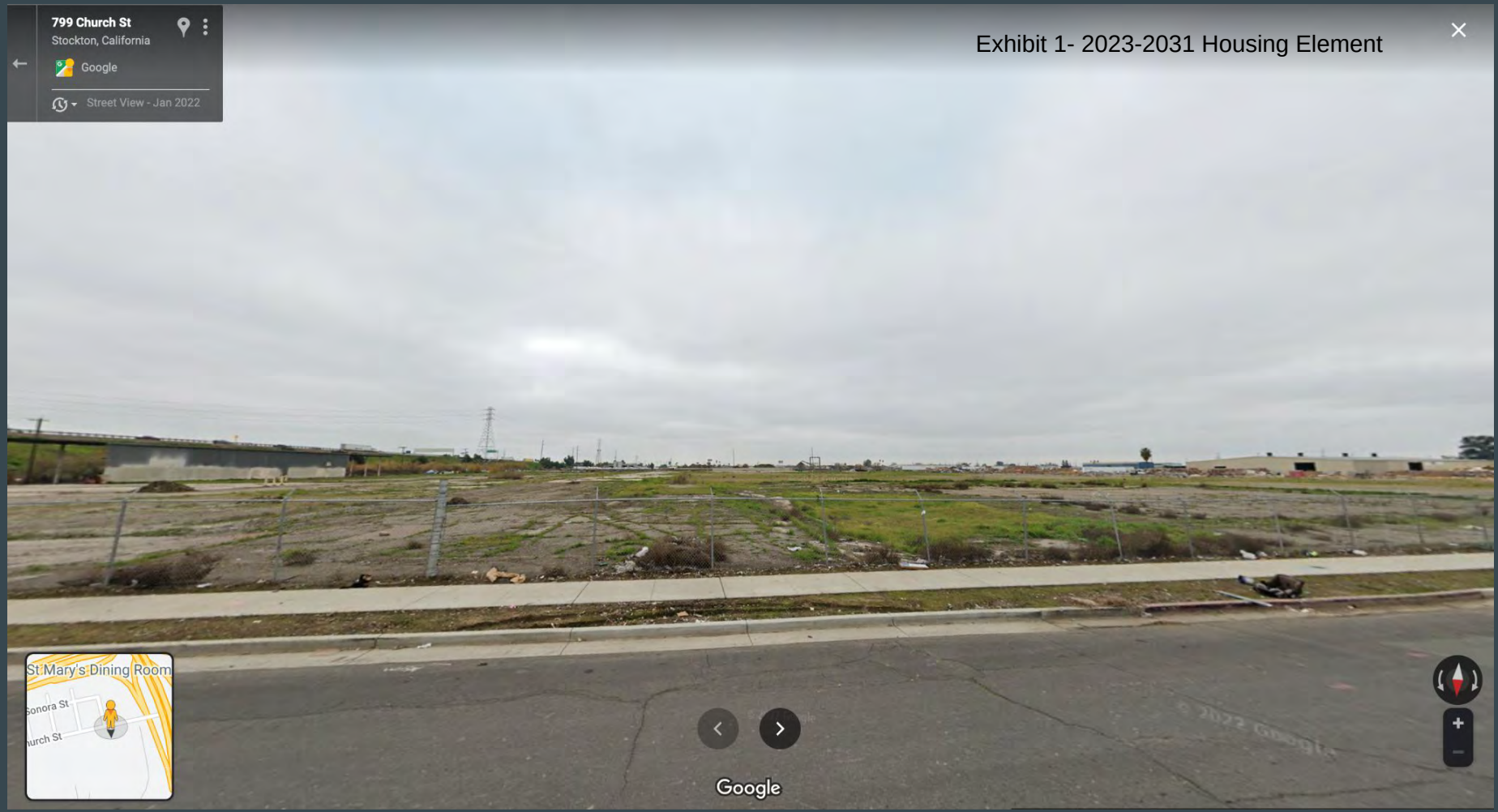
- EPA awarded Stockton a $600,000 Brownfield Assessment Grant
- City appropriated funds through September 2021
- Conducted an assessment of redeveloping the industrial waterfront
- City is actively recruiting developers
    - Local financial assistance is unclear



Example Site: Overlapping Clean-up and RHNA Inventory Site

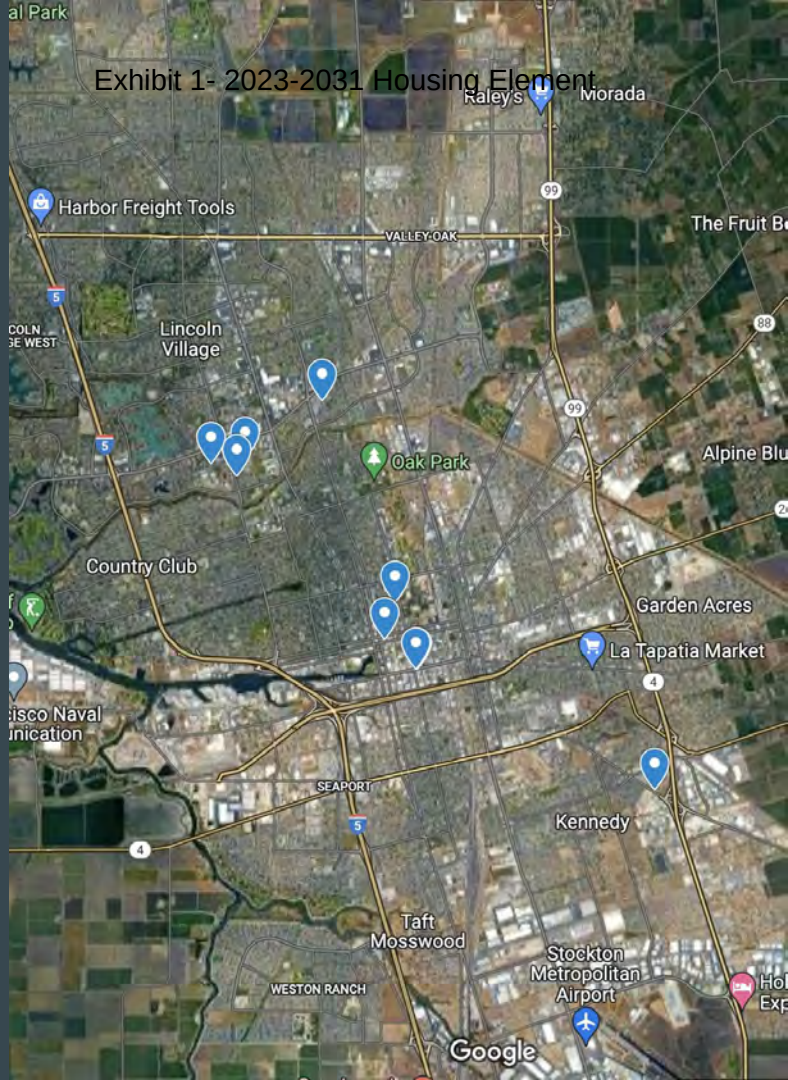
- 39.72 acres
- Overlaps clean-up site
- Surrounded on all sides by highways and rail
- Located adjacent to the I5 and highway 4 interchange and abuts rail
- Development unlikely without local financial assistance




799 Church St
Stockton, California
Google
Street View - Jan 2022
Exhibit 1- 2023-2031 Housing Element
St Mary's Dining Room
Google

5th Cycle Housing Element Deed Restricted Affordable Housing

- Constructed and approved deed restricted affordable housing between January 2014 and December 2023
- Sites are located across the city in less polluted areas
- Promising for 6th cycle



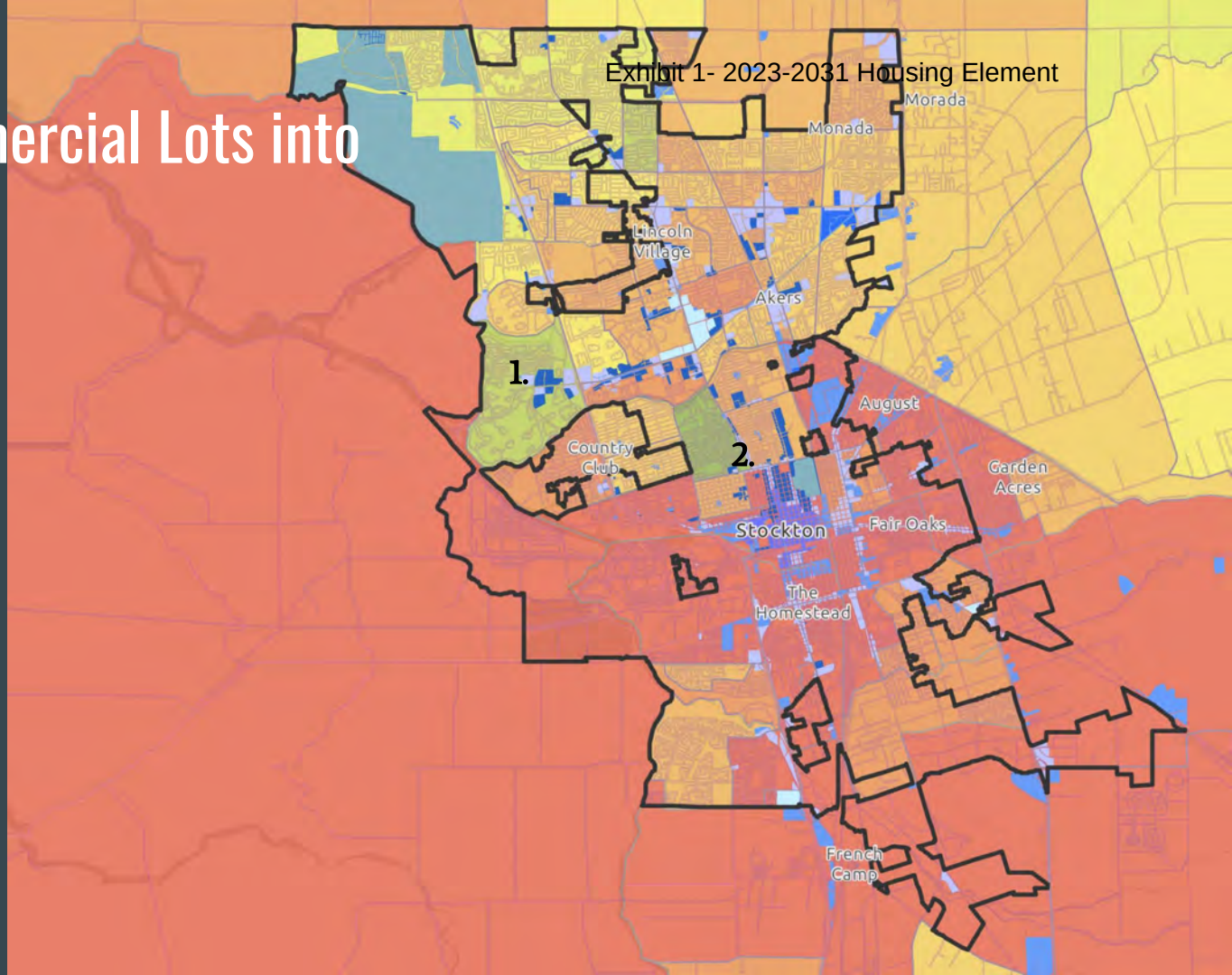
Incorporate Commercial Lots into RHNA Inventory

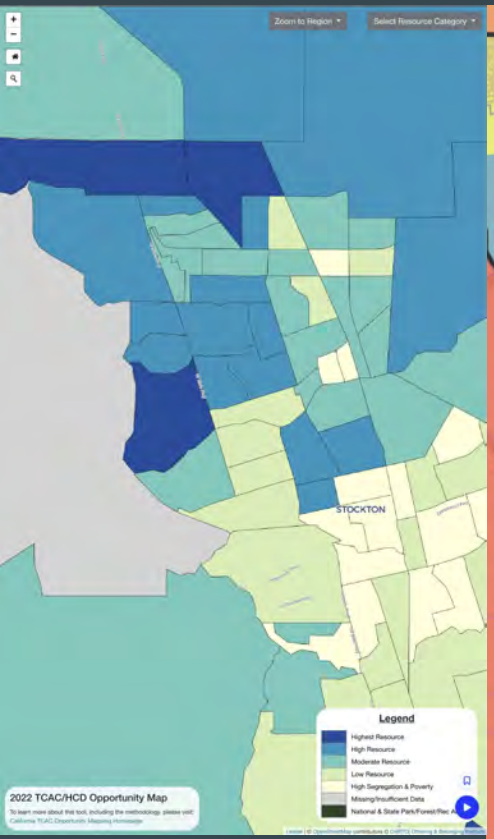
Case Study Area 1:

Brookside March Lane

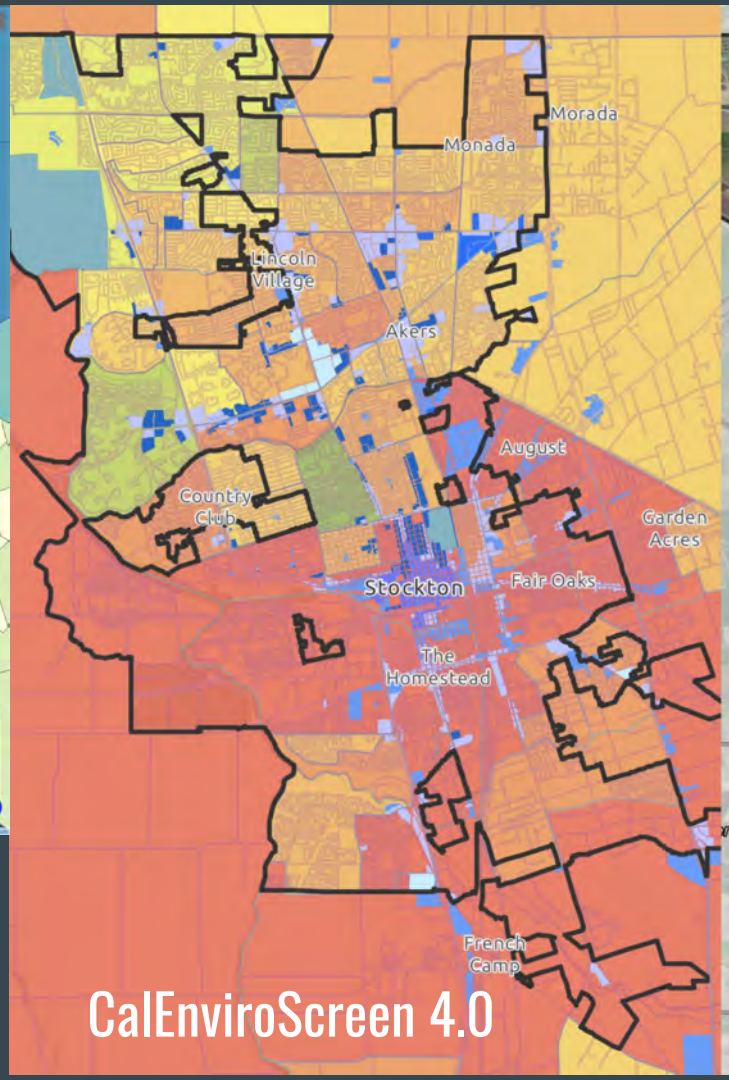
Case Study Area 2:

Miracle Mile

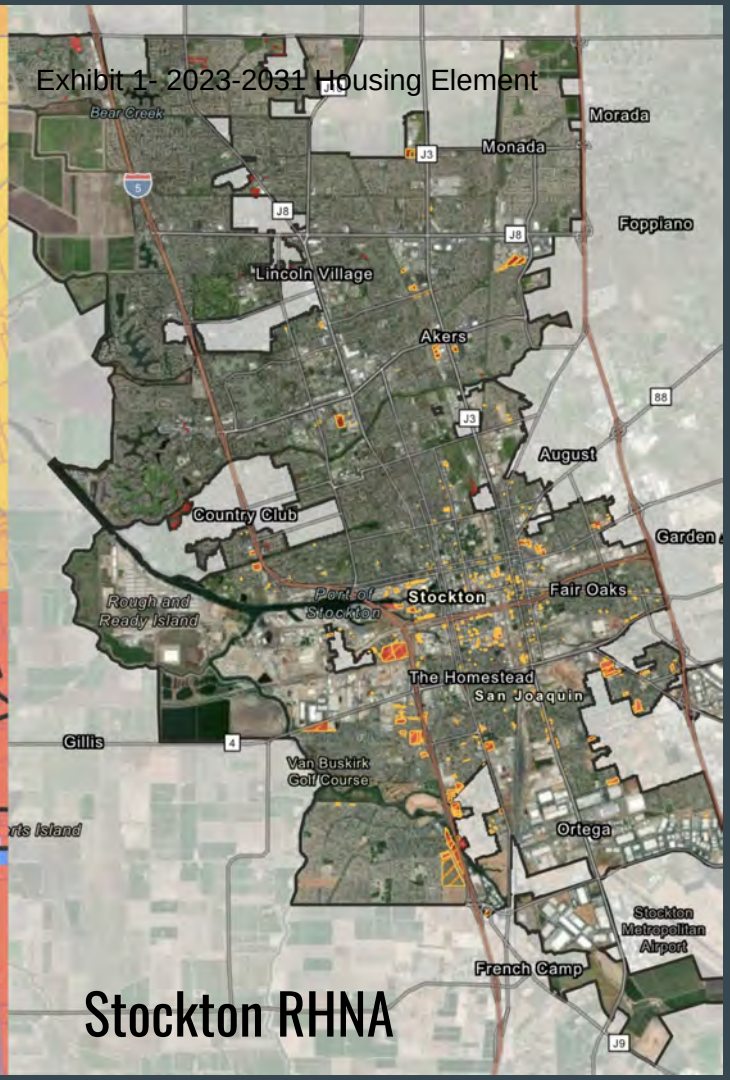




2022 TCAC/HCD Opportunity Map



CalEnviroScreen 4.0



Stockton RHNA

Case Study Area 1: Brookside March Lane

3404 Shadowbrook Dr.

APN 11628002

Acres 1.20; Sq. Ft. 52,008.99



Case Study Area 2: Miracle Mile

A.

1828 Pacific Ave

APN 13702042

Acres 0.69 Sq. Ft. 30,795.91

B.

2402 PACIFIC AV

APN 12506001

Acres 0.13 Sq. Ft. 6,073.93



Summary

- Far too soon to tell what Stockton's housing element will look like
- Stockton will have met its moderate and high-income RHNA allocation through entitled projects
- Redlining has lasting implications
- Sites concentrated in distressed and high polluted neighborhoods

Recommendations

1) Future stages of site selection must seriously consider high opportunity communities
2) The large site located near downtown should receive local financial assistance if the city wants to actually build there
3) Incorporate environmental justice into housing element

Recommendations

4) Incorporate unpolluted commercial zones, namely Miracle Mile & Brookside March Lane, into element

5) Government should not just focus on investing on North Stockton. South of the crosstown freeway also need some attention.

6) City should stop subsidizing unprofitable public golf courses in north Stockton and put money toward affordable housing fund.

QUESTIONS?

The Kennedy Commission, et al.,

v.

City of Costa Mesa, et al.,

30-2016-00832585

Judge Mary Strobel
Hearing: May 11, 2017

Tentative Decision on Petition for Writ of Mandate: Granted in part, Denied in part

Petitioners The Kennedy Commission, Mehrnoosh Barimani, Timothy Dadey, Denise Riddell, and Anthony Wagner as successor-in-interest to Patricia Wagner ("Petitioners") seek a writ of mandate compelling Respondents City of Costa Mesa and its City Council ("Respondents") to set aside four land use approvals related to the development of a luxury apartment complex by Real Party in Interest Miracle Mile Properties, LP ("Real Party"). Petitioners also seek declaratory and injunctive relief with regard to alleged violations of the California Relocation Assistance Act.

Judicial Notice

Petitioners' RJN Exhibits 1-7 – Granted.

Statement of the Case

Real Party is the owner of the Costa Mesa Motor Inn at 2277 Harbor Boulevard, Costa Mesa, CA.[1] (Pet. ¶¶ 1, 12; AR 215.) The Motor Inn is a 236-room two-story motel that was developed in 1972. A conditional use permit allowed the motel to operate with up to 40 percent of the rooms rented as long term occupancy (more than 28 days). (AR 58.) The 4.05 acre site is bounded by the Costa Mesa Golf Course to the north, commercial uses to the south, and residential uses to the west. As a motel, the site was zoned C1 (Local Business District) and with a land use designation of General Commercial. (AR 57.)

On or about March 7, 2014, the Real Party submitted a general plan screening application for a site specific General Plan amendment to "high density residential" reflecting 60 dwelling units per acre ("du/acre"), and a zone change to "Planned

[1] Earlier portions of the record refer to the property owner as Century Quality Management. (AR 215.) It is undisputed that Real Party is the current property owner. (AR 3153.) To avoid confusion, the court refers to the property owner as Real Party.

Development Residential – High Density" to allow construction of 236 apartment units to replace 236 motel units. (AR 1.)

In a letter to the mayor and city council dated March 3, 2014, Real Party's agent, Donald Lamm, described the proposed project to demolish the Motor Inn and replace it with "luxury apartments." Lamm acknowledged that the request for 60 du/acres was greater than allowed in the R-3 zone, and that "ours is an unusual proposal but one which is good urban planning." (AR 3-4; see also AR 138-139.)

In its July 29, 2014 screening application, Real Party paid a $1,760 for a density bonus review. (AR 215-216.) A project summary, dated July 25, 2014, described the proposed density of the project as follows: "40 units per acre x 4 acre = 160 units x 1.35 density bonus = 216 units." The summary indicated that 19 units would be reserved for moderate income residents. (AR 210.)

In a revised application submitted on or about July 10, 2015, Real Party sought density of 54 du/acre for the project and proposed that the city create a "Costa Mesa Density Bonus Program." Real Party wrote: "Since this applicant is not seeking any concessions, and therefore, the City is not mandated to grant a density bonus [under state law], the City 'may' still grant a density bonus on a site specific basis if Council believes the density bonus benefits the community." (AR 3158.)

In an agenda report dated October 23, 2015, the city planning division analyzed the proposed density. The planning division wrote that "the proposed base density would be 166 units (40 du/acre) with a development incentive for an additional 58 dwelling units to be justified by (a) provision of 20 affordable units for moderate-income households; and (b) complete demolition of the Costa Mesa Motor Inn." (AR 6615.) The planning division further stated that the site specific density request was not related to a density bonus under Government Code section 65915 et seq. and "the project is not requesting the City provide incentives or concessions." The planning division further noted that the "current 2013-2021 Housing Element does not include the Costa Mesa Motor Inn, or any other motels, as required to meet the RHNA [Regional Housing Needs Assessment] obligation for providing affordable housing. Also, … the current long-term rents at the Costa Mesa Inn are not considered affordable, as rents range between $1,213 and $1,334 for a 300 square-foot room." (AR 6615.)

On November 3 and 17, 2015, the City Council adopted the following land use actions related to the Project:

- Resolution No. 15-16, approving a General Plan amendment changing the project site's land use designation from General Commercial to High Density Residential, with a site specific density of 54 du/acre for the proposed 224-unit

apartment complex (AR 6662). The resolution stated that a "development incentive" was justified by "(a) provision of 20 affordable units for moderate-income households and (b) complete demolition of the Costa Mesa Motor Inn." (Ibid.)

- Resolution No. 15-61, approving the Project's master plan for the Project (AR 6662-6669);
- Ordinance No. 15-14, rezoning the Property as high density residential (AR 7018-19); and
- Ordinance No. 15-15, adopting a zoning code amendment for a site-specific density of 54 du/acre (AR 7153-56.)

Procedural History

On January 28, 2016, Petitioners filed a verified petition for writ of mandate and complaint for declaratory and injunctive relief.

On June 10, 2016, the court (Judge Robert O'Brien) granted Petitioners' motion for a preliminary injunction with respect to Petitioners' claims under the California Relocation Assistance Act. The court entered an order enjoining implementation of the four entitlements approved by the City Council on November 3 and 17, 2015. On July 29, 2016 and August 9, 2016, Petitioners filed ex parte applications for a TRO or other injunctive relief to enjoin Real Party from vacating the motel. The court (Judge O'Brien and Judge Brazile) denied the applications. (See Thompson Decl. ¶¶ 9-12.) The Court of Appeal denied Petitioners' petition for writ of supersedeas and request for an immediate stay. (Id. Exh. E.) On November 14, 2016, this court denied Petitioners' ex parte application for a stay pending appeal.

On February 3, 2017, Petitioners filed their opening brief in support of the writ petition. The court has received Respondents' and Real Party's opposition briefs, and Petitioners' reply.

Standard of Review

In the petition and opening brief, Petitioners contend that they are entitled to writ relief under section 1085. (OB 12-13.) In opposition, Respondents and Real Party dispute this standard of review, pointing out that hearings were required and held by the City Council before the approvals were granted. (See Resp. Oppo. 2.) It appears that some parts of the petition fall under section 1085, while others are reviewed by administrative mandamus.

"Judicial review via administrative mandate is available 'only if the decision[] resulted from a 'proceeding in which *by law*: 1) *a hearing is required to be given*, 2)

evidence is required to be taken, and 3) discretion in the determination of facts is vested in the agency.' Thus, ordinary mandate is used to review adjudicatory actions or decisions when the agency was not required to hold an evidentiary hearing." (*Bunnett v. Regents of University of California* (1995) 35 Cal.App.4th 843, 848.)

CCP Section 1094.5

"The grant of a land use permit or variance is an adjudicatory act, subject to review by administrative mandamus." (*Wollmer v. City of Berkeley* (2009) 179 Cal.App.4th 933, 938.) Under CCP section 1094.5(b), an abuse of discretion is established if the agency has not proceeded in the manner required by law, the decision is not supported by the findings, or the findings are not supported by the evidence. (CCP § 1094.5(b).)

Petitioners do not assert that a fundamental vested right is involved. Therefore, the standard of review of factual determinations is the substantial evidence test. (*Patterson Flying Serv. V. Dep't of Pesticide Regulation* (2008) 161 Cal.App.4th 411, 419 and fn. 1.) Substantial evidence is relevant evidence that a reasonable mind might accept as adequate to support a conclusion (*California Youth Authority v. State Personnel Board* (2002) 104 Cal. App. 4th 575, 584-85), or evidence of ponderable legal significance which is reasonable in nature, credible and of solid value. (*Mohilef v. Janovici* (1996) 51 Cal. App. 4th 267, 305 n. 28.)

As to zoning issues, "[a] governing body's conclusion that a particular project is consistent with the relevant general plan carries a strong presumption of regularity that can be overcome only by a showing of abuse of discretion." (*Wollmer v. City of Berkeley* (2009) 179 Cal.App.4th 933, 940.) "This review is highly deferential to the local agency, recognizing that the body which adopted the general plan policies in its legislative capacity has unique competence to interpret those policies when applying them in its adjudicatory capacity.... A reviewing court's role 'is simply to decide whether the city officials considered the applicable policies and the extent to which the proposed project conforms with those policies.'" (Ibid.)

CCP Section 1085

It appears that Petitioners' fourth cause of action for violation of the California Relocation Assistance Act is reviewable under section 1085. Petitioners appear to assert that Respondents owe a clear, present, and ministerial duty to comply with the CRAA. (Pet. ¶¶ 80-85.)

There are two essential requirements to the issuance of an ordinary writ of mandate under Code of Civil Procedure section 1085: (1) a clear, present and

ministerial duty on the part of the respondent, and (2) a clear, present and beneficial right on the part of the petitioner to the performance of that duty. (*California Ass'n for Health Services at Home v. Department of Health Services* (2007) 148 Cal.App.4th 696, 704.) "In general, when review is sought by means of ordinary mandate the inquiry is limited to whether the decision was arbitrary, capricious, or entirely lacking in evidentiary support." (*Bunnett, supra* at 849.)

While not discussed by the parties, the court notes that "adoption of the general plan or any part or element thereof or the adoption of any amendment to such plan or any part or element thereof is a legislative act which shall be reviewable pursuant to Section 1085 of the Code of Civil Procedure." (Gov. Code § 65301.5; *Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 535.) However, Petitioners do not appear to challenge the adoption of the General Plan amendment under section 65301.5.

Statutory Interpretation

Interpretation of a statute, such as the state Density Bonus Law, presents a question of law that the court reviews de novo. (*Woodland Park Management, LLC v. City of East Palo Alto Rent Stabilization Bd.* (2010) 181 Cal.App.4th 915, 919.)

"The rules governing statutory construction are well settled. We begin with the fundamental premise that the objective of statutory interpretation is to ascertain and effectuate legislative intent. [Citations.] To determine legislative intent, we turn first to the words of the statute, giving them their usual and ordinary meaning. [Citations.] When the language of a statute is clear, we need go no further. However, when the language is susceptible of more than one reasonable interpretation, we look to a variety of extrinsic aids, including the ostensible objects to be achieved, the evils to be remedied, the legislative history, public policy, contemporaneous administrative construction, and the statutory scheme of which the statute is a part." (*Nolan v. City of Anaheim* (2004) 33 Cal.4th 335, 340.)

When interpreting a statute, the court must construe the statute, if possible to achieve harmony among its parts. (*People v. Hall* (1991) 1 Cal. 4th 266, 272; *Legacy Group v. City of Wasco* (2003) 106 Cal.App. 4th 1305, 1313). "When the legislature has carefully employed a term in one place and has excluded it in another, it should not be implied where excluded." (*Wasatch Property Management v. Degrate* (2005) 35 Cal.4th 1111.) "When interpreting statutory language, we may neither insert language which has been omitted nor ignore language which has been inserted." (See *People v. National Auto. and Cas. Ins. C*o. (2002) 98 Cal.App.4th 277, 282.)

Analysis

State Density Bonus Law

Petitioners argue that "City violated the text, spirit, and history of the DBL [Density Bonus Law] by providing a density bonus grossly in excess of generally-allowable maximum densities in exchange for replacing low-income housing with a luxury apartment complex." (Opening Brief (OB 13.) Petitioners make two sub-arguments: the Project does not qualify for a density bonus under the express language of the DBL, and the Project violates the DBL's "no net loss" provision. (OB 13-15.) Petitioners also make a preemption argument, stating that the DBL was intended "to constrain municipalities' ability to hand out valuable concessions without extracting affordable housing commitments." (OB 13.)

"The purpose of the Density Bonus Law is to encourage and provide incentives to developers to include low and moderate income housing units in their developments. (§ 65913.) 'In 1979, the Legislature added several provisions to the Planning and Zoning Law ([ ] § 65000 et seq.) to address the shortage of affordable housing in California. ([ ] § 65913, subd. (a); [citations].) One of these statutes, Section 65915, offers incentives to developers to include low income housing in new construction projects. Although application of the statute can be complicated, its aim is fairly simple: When a developer agrees to construct a certain percentage of the units in a housing development for low- or very-low-income households, ... the city or county must grant the developer one or more itemized concessions and a 'density bonus,' which allows the developer to increase the density of the development by a certain percentage above the maximum allowable limit under local zoning law. [Citation.] In other words, the Density Bonus Law 'reward[s] a developer who agrees to build a certain percentage of low-income housing with the opportunity to build more residences than would otherwise be permitted by the applicable local regulations.' [Citations]." (*Wollmer v. City of Berkeley* (2009) 179 Cal.App.4th 933, 940-941.)

When Real Party proposed the project, there were four ways to quality for a residential density bonus under the DBL: the developer must agree to reserve either (1) ten percent of the project's total units for lower income households; (2) five percent of the project's total units for very low-income households; (3) all units in a project for senior citizens; or (4) in a "common interest development", 10 percent of the project's total units for moderate-income households. (§ 65915(b)(1).)

In its agenda report dated October 23, 2015, the city planning division stated that the site specific density request was not related to a density bonus under Government Code section 65915 et seq. and "the project is not requesting the City provide incentives or concessions." (AR 6615.) These statements are consistent with Real Party's July 2015 application. (AR 3158.) There is no indication from the resolutions and

ordinances at issue that City was intending to grant a density bonus or other concessions under the DBL.

For similar reasons, Petitioners' argument that the Project violates the DBL's no net loss provision is not directly on point. Because Real Party did not seek or obtain a density bonus or other concessions under the DBL, the no let loss provision does not apply directly to the Project. (§ 65915(c)(3).) However, as discussed below, various parts of the DBL, including the no net loss provision, suggest legislative intent to preclude local governments from granting density bonuses in a manner inconsistent with the DBL.[2]

As argued by Petitioners, the undisputed record suggests that City granted a large density bonus above the maximum density allowed by the General Plan. (See Reply 7.) Prior to November 3, 2015, the maximum allowable density pursuant to the Motor Inn's General Plan designation of General Commercial was 20 du/acre.[3] The density for a land use designation of High Density Residential, to which the Project site was changed on November 3, 2015, was also 20 du/acre. However, a density of 40 du/acre was apparently allowed in some parts of the City for this residential designation.[4] (AR 5906.) City granted an increase to 54 du/acre for the Project. (See AR 6662.) Real Party promised to build only 20 moderate-income rental units, but the Project was not a "common interest development" that would qualify for a density bonus under the DBL. Real Party did not promise to build units for low or very-low income residents. Moreover, for a density bonus of 35 % (from 40 du/acre to 54 du/acre), the project applicant must agree to build 11 percent very low-income units; 20 percent low

[2] Petitioners cite AR3153-3160 to support their claim that approximately 50 low or very low income households occupied rooms at the Motor Inn when the project approvals were implemented. However, the court was unable to locate this evidence in the cited portion of the record. Counsel should address this at the hearing.

[3] The opposition papers argue that land zoned C1, which prohibits residential uses, were approved for a base density of zero (0) du/acre. (Real Party Oppo. 8.) The court does not find that distinction to be dispositive, as the land was rezoned to high density residential.

[4] According to a table cited by Petitioners, the density for a land use designation of high-density residential is 20 du/acre. (AR 5906.) However, the land use element states that certain areas in North Costa Mesa allow density in excess of 20 du/acre for that designation. (AR 5906.) Although not clear, Petitioners appear to concede that a density of 40 du/acre was allowable for a designation of High Density Residential at the Project site. (See OB 11:8; Reply 10-11.) The parties have not fully explained whether the density of 40 du/acre was allowed under the General Plan as written at the time of the application. (See AR 3157.) This distinction is not dispositive to the writ.

income units; or 40 percent moderate income units (in a common interest development.) (§ 65915(f).) It is undisputed that the Project did not comply with these requirements.

Therefore, the issue is whether the DBL preempts localities, such as the City, from granting a density bonus for Projects that do not qualify under the DBL. "Local legislation that conflicts with state law is void. 'A conflict exists if the local legislation 'duplicates, contradicts, or enters an area fully occupied by general law, either expressly or by legislative implication.'" (*City of Riverside v. Inland Empire Patients Health and Wellness Center, Inc.* (2013) 56 Cal.4th 729, 743.)

Are City's Actions Contradictory of the DBL?

"The 'contradictory and inimical' form of preemption does not apply unless the ordinance directly requires what the state statute forbids or prohibits what the state enactment demands. [Citations.] Thus, no inimical conflict will be found where it is reasonably possible to comply with both the state and local laws." (*City of Riverside, supra,* 56 Cal.4th at 743.)

The DBL provides "that when a housing developer agrees to construct a certain percentage of total units of a housing development for low-income households, a county shall grant a density bonus and at least one of several itemized concessions or incentives or provide other incentives of equivalent value based on the land cost per dwelling unit." (*Shea Homes Ltd. Partnership v. County of Alameda* (2003) 110 Cal.App.4th 1246, 1262-63; see also *Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 825.)

The following subdivisions of Section 65915, among others, are relevant to the analysis of whether City's approval of a density bonus is inimical to the DBL:

> (a)(1) ***When an applicant seeks a density bonus for a housing development*** within, or for the donation of land for housing within, the jurisdiction of a city, county, or city and county, ***that local government shall comply with this section***. A city, county, or city and county shall adopt an ordinance that specifies how compliance with this section will be implemented. Failure to adopt an ordinance shall not relieve a city, county, or city and county from complying with this section....(emphasis added.)
>
> (b)(1) A city, county, or city and county shall grant one density bonus, the amount of which shall be as specified in subdivision (f), and, if requested by the applicant and consistent with the applicable requirements of this section, incentives or concessions, as described in subdivision (d), waivers or reductions of development standards, as described in subdivision (e), and parking ratios, as

described in subdivision (p), when an applicant for a housing development seeks and agrees to construct a housing development, excluding any units permitted by the density bonus awarded pursuant to this section, that will contain at least any one of the following: .... [¶¶]

(f) For the purposes of this chapter, "density bonus" means a density increase over the otherwise maximum allowable gross residential density as of the date of application by the applicant to the city, county, or city and county....

(n) ***If permitted by local ordinance***, ***nothing in this section shall be construed to prohibit a city***, county, or city and county from granting a density bonus greater than what is described in this section for a development that meets the requirements of this section or ***from granting a proportionately lower density bonus than what is required by this section for developments that do not meet the requirements of this section.*** (emphasis added.) .... [¶¶]

(o)(2) ***"Maximum allowable residential density" means the density allowed under the*** zoning ordinance and ***land use element of the general plan***, or, if a range of density is permitted, means the maximum allowable density for the specific zoning range and land use element of the general plan applicable to the project. Where the density allowed under the zoning ordinance is inconsistent with the density allowed under the land use element of the general plan, the general plan density shall prevail.... [¶¶]

(r) This chapter shall be interpreted liberally in favor of producing the maximum number of total housing units.

Section 65917 of the DBL, titled "Legislative intent; development agreement," is also relevant and provides in full:

In enacting this chapter it is the intent of the Legislature that the density bonus or other incentives offered by the city, county, or city and county pursuant to this chapter shall contribute significantly to the economic feasibility of lower income housing in proposed housing developments. ***In the absence of an agreement by a developer in accordance with Section 65915, a locality shall not offer a density bonus or any other incentive that would undermine the intent of this chapter.*** (§ 65917 [emphasis added].)

A reasonable interpretation of section 65915, in light of the stated legislative intent, is that the legislature intended to create a comprehensive framework for cities and other local governments to grant incentives to developers to include low income housing in development projects. Notably, section 65915(a) states that "when an

applicant seeks a density bonus for a housing development within … a city … that local government shall comply with this section." This language seems intended to encompass all applications for density bonuses for a housing development. Subdivision (a) also requires cities to "adopt an ordinance that specifies how compliance with this section will be implemented." Respondents have not cited to any portions of city law allowing the City to grant density bonuses separate from the DBL.

In subdivision (n), the legislature granted localities limited discretion to grant "a density bonus greater than what is described in this section for a development that meets the requirements of this section or [grant] ***a proportionately lower*** density bonus than what is required by this section for developments that do not meet the requirements of this section." This subdivision, especially when read in light of the legislative intent in section 65917, shows intent to allow localities to grant density bonuses only when consistent with the DBL's purpose to promote affordable housing.

In opposition, Respondents argue that it is possible to comply with both the DBL and the local laws because the four City approvals at issue are not city-wide zoning regulations and the DBL can be applied freely throughout the rest of the City. Therefore, Respondents contend that there is no direct conflict with the DBL. (Resp. Oppo. 3-4.) Respondents, however, do not persuasively address the language and structure of section 65915, which shows intent to limit the discretion of localities to grant density bonuses for housing developments that do not promote the affordable housing goals of the DBL. Respondents also do not show that the density bonus granted in this case is "proportionally lower" than what is required by the DBL. (§ 65915(n).)

Respondents contend that a similar issue was decided in *Shea Homes Ltd. Partnership v. County of Alameda* (2003) 110 Cal.App.4th 1246, which held that a county initiative that reserved land for agricultural and open space did not conflict with the DBL. The court reasoned that "Counties will necessarily vary the permissible density depending on the land use designation of a particular area," and the initiative did not preclude accommodation of the DBL in other regions of the county. (Id. at 1263.) Here, in contrast to the initiative in *Shea*, City's action is inconsistent with the language and intent of the DBL.

Real Party contends that the DBL "was never available to Miracle Mile because the Property's zone at the time of application was C1 (Local Business), which specifically prohibits any residential use." Real Party further contends that the base density for the Project site, with a designation of C1, before the entitlements were approved was zero. (Real Party Oppo. 8.) Judge O'Brien denied a preliminary injunction on the DBL claim in part because Petitioners could not "get beyond the fact that it [the base density] was zero at the application date." (Id. Exh. A at p. 53.) Respectfully, the court does not agree that it is dispositive whether or not the Project

site was designated C1 at the time of the application. At the same time Real Party requested that City approve a 35% density bonus, it also requested a change in the Property's zone from C1 to Residential-High Density. (AR 3157.) Real Party was an "applicant seek[ing] a density bonus for a housing development" within the City's jurisdiction and was subject to the DBL. (§ 65915(a)(1).) If Real Party had desired to build an affordable housing project that would have qualified for a density bonus and incentives under the DBL, it seems that Real Party could have sought such benefits regardless of whether the Project site required a zone change from C1 to high density residential. Also, it raises form over substance to argue that a project site designated C1 evades the DBL, even if the development necessarily requires a zone change to residential. (See Resp. Oppo. 6:1-7.)

Based on the foregoing, the court concludes that City's approval of a density bonus for a residential project that would not qualify for a bonus under the DBL, and is not "proportionally lower" than what is required by the DBL, conflicts with the language and intent of the statute.

Does the DBL Fully Occupy the Field?

"Local legislation enters an area that is 'fully occupied' by general law when the Legislature has expressly manifested its intent to 'fully occupy' the area [citation], or when it has impliedly done so in light of one of the following indicia of intent: '(1) the subject matter has been so fully and completely covered by general law as to clearly indicate that it has become exclusively a matter of state concern; (2) the subject matter has been partially covered by general law couched in such terms as to indicate clearly that a paramount state concern will not tolerate further or additional local action; or (3) the subject matter has been partially covered by general law, and the subject is of such a nature that the adverse effect of a local ordinance on the transient citizens of the state outweighs the possible benefit to the' locality. [Citations.]" (*City of Riverside, supra,* 56 Cal.4th at 743.)

The courts "have been particularly 'reluctant to infer legislative intent to preempt a field covered by municipal regulation when there is a significant local interest to be served that may differ from one locality to another.' 'The common thread of the cases is that if there is a significant local interest to be served which may differ from one locality to another then the presumption favors the validity of the local ordinance against an attack of state preemption.' " (Id. at 744.)

The City's police powers include "limitations on the density and size of permissible residential development." (*California Bldg. Industry Assn. v. City of San Jose* (2015) 61 Cal.4th 435, 455.)

As analyzed above, the language and structure of the DBL, as well as the statements of legislative intent, are reasonably interpreted to preclude local governments from granting density bonuses for housing developments that are not consistent with the requirements of the DBL and the goal of promoting affordable housing.

Respondents argue that "cases have found that the DBL was intended to be a permissive, not mandatory, statute." (Resp. Oppo. 5.) In fact, cases have held that section 65915 is "mandatory." (See *Wollmer v. City of Berkeley* (2009) 179 Cal.App. 4th 933, 941; see also *Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 825-826.) These cases do hold that section 65915 authorizes a municipality to "award additional density bonus units in excess of the mandated number of density bonus units" pursuant to the DBL. (*Wollmer, supra* at 944; *Friends of Lagoon, supra* at 825-826.) However, these cases address developments that qualified for density bonuses under the DBL, and the cities decided to award additional units above the amount required by the DBL. Such decisions are consistent with section 65915(n), discussed above. Neither *Wollmer* nor *Friends of Lagoon* shows that the DBL is "permissive" in the manner argued by Respondents.

Both Respondents and Real Party highlight certain words in sections 65915 and 65917 to support their construction of the statute. (Resp. Oppo. 4; Real Party Oppo. 8-9.) For instance, Respondents point out that the first sentence of section 65917 refers to density bonuses and incentives offered "pursuant to this chapter." Real Party contends that the word "incentives" in this sentence shows the legislature did not intend the DBL to be the exclusive tool for a municipality to offer a "development incentive." However, the opposition papers do not persuasively address the second sentence of section 65917, which shows strong intent to preclude localities from offering "a density bonus or any other incentive that would undermine the intent of this chapter." They also do not address the portions of section 65915(a) and (n), discussed above, that show intent to limit the authority of local governments to offer density bonuses in a manner that undermines the goals of the DBL.

The court agrees that the DBL does not show intent to occupy the entire field of residential density zoning. As discussed above, section 65915(n) expressly allows local governments to grant a larger density bonus for a project that meets the requirements of the DBL, or a "proportionately lower" bonus for projects that do not meet the requirements of the DBL. However, Respondents and Real Party do not not make any argument that the density bonus granted in this case is "proportionately lower density bonus than what is required" by the DBL. (§ 65915(n).)

As discussed, the statute shows intent to preclude local governments from granting density bonuses for housing developments that are not consistent with the requirements of the DBL and the goal of promoting affordable housing.

Based on the foregoing, City prejudicially abused its discretion in granting the density bonuses in the Project approvals in a manner not consistent with the DBL. The court sets aside Resolutions 15-60 and 15-61 and Ordinances 15-14 and 15-15 to the extent those approvals granted "development incentives" or other density bonuses in a manner inconsistent with the DBL.[5]

The General Plan

Petitioners assert that the City's actions are inconsistent with the Housing Element of the City's General Plan in violation of Government Code section 65860. (OB 15-17; Reply 12-13.)

Pursuant to section 65860(a), "county or city zoning ordinances shall be consistent with the general plan." A zoning ordinance "shall be consistent" with a general plan only if "the various land uses authorized by the ordinance are compatible with the objectives, policies, general land uses, and programs specified in the plan." (§ 65860(a)(2).)

"A zoning ordinance that is inconsistent with the general plan is invalid when passed and one that was originally consistent but has become inconsistent must be brought into conformity with the general plan. (§ 65860.) The Planning and Zoning Law does not contemplate that general plans will be amended to conform to zoning ordinances. The tail does not wag the dog. The general plan is the charter to which the ordinance must conform." (*Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 541.)

On November 3, 2015, the City Council passed a resolution approving a General Plan amendment changing the Project site's land use designation from General Commercial to High Density Residential, with a site specific density of 54 du/acre for the proposed 224-unit apartment complex. (AR 6662.)

[5] Respondents contend that the DBL arguments only apply to Ordnance Nos. 15-14 and 15-15. (Oppo. 2, fn. 6.) Resolution 15-60 also is affected because it granted a general plan amendment for a density "development incentive" of a specific parcel. (AR 6662.) Resolution 15-61 also approved a master plan for a Project with a "site-specific density of 54 du/acre" and therefore is intertwined with the density decision of the other three approvals. (AR 6670.) The court concludes that all four approvals are affected at least in part by the violation of the DBL.

In this context, *Lesher, supra* is distinguishable. *Lesher* stands for the proposition that a general plan can only be amended via a general plan amendment and that zoning ordinances themselves cannot impliedly amend or repeal inconsistent portions of a general plan. (*Lesher, supra* at 540-541.) As indicated in Judge Mosk's dissent in *Lesher*, that case involved "a pure consistency challenge" between the zoning ordinance and the general plan. (Id. at 550.) The majority in *Lesher* also found that a subsequent general plan amendment could not save the ordinance because "a zoning ordinance that conflicts with a general plan is invalid at the time it is passed." (Id. at 544.) In contrast to *Lesher*, the General Plan amendment here was adopted before the challenged zoning ordinances.

However, the General Plan amended appears not to have changed other portion of the General Plan linking density bonus to compliance with state or local density bonus law. (See RJN Exh.1, p. HOU 53). Thus the approvals appear to be inconsistent with at least portion of the General Plan.

Government Code Section 65008

Petitioners contend that the Project approvals discriminate against Motor Inn's low and very low income residents in violation of Government Code section 65008. Relying on statements of councilmembers and then major pro tem Righeimer, Petitioners argue that City "wanted to displace low-income Motor Inn residents and 'replace' them with 'desirable' tenants." (OB 17-18.)

Government Code section 65008(a)(3) provides: "Any action pursuant to this title by any city, county, city and county, or other local governmental agency in this state is null and void if it denies to any individual or group of individuals the enjoyment of residence ... because of ... (3) The intended occupancy of any residential development by persons or families of very low, low, moderate, or middle income."

Section 65008(b)(1)(C) provides in relevant part: "No city, county, city and county, or other local governmental agency shall, in the enactment or administration of ordinances pursuant to any law, including this title, prohibit or discriminate against any residential development or emergency shelter for any of the following reasons: ... (C) Because the development or shelter is intended for occupancy by persons and families of very low, low, or moderate income, as defined in Section 50093 of the Health and Safety Code, or persons and families of middle income."

In its statement of legislative intent, section 65008(h) provides: "The Legislature finds and declares that discriminatory practices that inhibit the development of housing

for persons and families of very low, low, moderate, and middle incomes, or emergency shelters for the homeless, are a matter of statewide concern."

The plain language of the statute prohibits a locality from discriminating against "any residential development" because the development is intended for occupancy by persons or families of very low, low, moderate, or middle income. It is undisputed that the Project was not intended as a residential development for persons and families of very low or low income. (OB 18.) In reply, Petitioners contend that "had the City followed the law, the redevelopment would *include* lower income units." (Reply 12.) Petitioners cite no evidence that Real Party would have built a residential development for lower income persons or families if the City had denied its request for a density bonus. Therefore, section 65008 does not apply to the Project.

While not entirely clear, Petitioners perhaps are arguing that the Motor Inn itself is a "residential development" under section 65008. Section 65008(f) defines "residential development" as "single-family residence or a multifamily residence, including manufactured homes." The Motor Inn was zoned commercial. Petitioners fail to show that a motel in a commercial zone qualifies as a "residential development" under the statute. Moreover, even assuming a motel could be viewed as a residential development, Petitioners fail to show that Real Party was obligated by law to maintain the property as a motel. It seems from the use of the word "development," as well as the phrase "intended occupancy" in section 65008(a)(3), that redevelopment of a commercial property in this fashion was not intended to be protected by section 65008, unless the property owner pursued a project with intended occupancy for very low, low, or moderate income persons or families.

Petitioners fail to show a violation of section 65008.

The California Relocation Assistance Act

Petitioners contend that the Project approvals violate the California Relocation Assistance Act ("CRAA") by using a city initiative to require displacement of Motor Inn residents without providing a statutorily mandated relocation assistance plan, relocation benefits, and comparable replacement housing for displaced residents. (OB 18-20.)

Among other requirements, the CRAA requires that a public entity prepare a relocation plan well before the commencement of any "programs or projects undertaken by a public entity" that will result in "displacement" of individuals or families. (See Gov. Code § 7261.) Also, "whenever a program or project to be undertaken by a public entity will result in the displacement of any person, the displaced person is entitled to payment for actual moving and related expenses as the public entity determines to be reasonable and necessary." (§ 7261(a).)

As relevant to this petition, the CRAA defines "displaced person" as "Any person who moves from real property, or who moves his or her personal property from real property… (ii) As a direct result of the rehabilitation, demolition, or other displacing activity, as the public entity may prescribe under a program or project undertaken by a public entity, of real property on which the person is a residential tenant or conducts a business or farm operation, if the public entity determines that the displacement is permanent." (Gov. Code § 7260(c)(1)(A)(ii).)

It appears undisputed that persons who were long-time residents of the Motor Inn have been required to vacate the premises.[6] (See Dadey Decl.; Riddell Decl.; Barimani Decl.) However, in light of the court's ruling that the Project approvals violate the DBL, the court need not and does not reach the issue. Petitioner's claim under the CRAA is for declaratory or injunctive relief. A cause of action for declaratory and injunctive relief will be transferred to an individual calendar court for resolution. Petitioners have not shown they are entitled to a writ of mandate in connection with the CRAA claim.

Conclusion

The petition is GRANTED in part. The court sets aside Resolutions 15-60 and 15-61 and Ordinances 15-14 and 15-15 to the extent those approvals granted "development incentives" or other density bonuses in a manner inconsistent with the DBL. The petition is DENIED in all other respects.

[6] As discussed in the procedural history, the court denied ex parte applications to enjoin Real Party from vacating the motel, and also denied an ex parte application for a stay pending appeal.

MEMORANDUM OF AGREEMENT

This Memorandum of Agreement ("Agreement") is entered into by and between the City of Stockton ("City"), Edmund G. Brown Jr., Attorney General of California, on behalf of the People of the State of California ("Attorney General"), and the Sierra Club, and it is dated and effective as of the date that the last Party signs ("Effective Date"). The City, the Attorney General, and the Sierra Club are referred to as the "Parties."

RECITALS

On December 11, 2007, the City approved the 2035 General Plan, Infrastructure Studies Project, Bicycle Master Plan, Final Environmental Impact Report ("EIR"), and Statement of Overriding Considerations. The General Plan provides direction to the City when making land use and public service decisions. All specific plans, subdivisions, public works projects, and zoning decisions must be consistent with the City's General Plan. As adopted in final form, the General Plan includes Policy HS-4.20, which requires the City to "adopt new policies, in the form of a new ordinance, resolution, or other type of policy document, that will require new development to reduce its greenhouse gas emissions to the extent feasible in a manner consistent with state legislative policy as set forth in Assembly Bill (AB) 32 (Health & Saf. Code, § 38500 et seq.) and with specific mitigation strategies developed by the California Air Resources Board (CARB) pursuant to AB 32[.]" The policy lists the following "potential mitigation strategies," among others, for the City to consider:

(a) Increased density or intensity of land use, as a means of reducing per capita vehicle miles traveled by increasing pedestrian activities, bicycle usage, and public or private transit usage; and

(b) Increased energy conservation through means such as those described in Appendix F of the State Guidelines for the California Environmental Quality Act.

The 2035 General Plan also includes other Policies and goals calling for infill development, increased transit, smart growth, affordable housing, and downtown revitalization.

In December 2006, in accordance with the requirements of the California Environmental Quality Act ("CEQA"), the City prepared and circulated a Draft EIR. Comments were received on the EIR; the City prepared responses to these comments and certified the EIR in December 2007.

On January 10, 2008, the Sierra Club filed a Petition for Writ of Mandate in San Joaquin County Superior Court (Case No. CV 034405, hereinafter "Sierra Club Action"),

alleging that the City had violated CEQA in its approval of the 2035 General Plan. In this case, the Sierra Club asked the Court, among other things, to issue a writ directing the City to vacate its approval of the 2035 General Plan and its certification of the EIR, and to award petitioners' attorney's fees and costs.

The Attorney General also raised concerns about the adequacy of the EIR under CEQA, including but not limited to the EIR's failure to incorporate enforceable measures to mitigate the greenhouse gas ("GHG") emission impacts that would result from the General Plan.

The City contends that the General Plan and EIR adequately address the need for local governments to reduce greenhouse gas ("GHG") emissions in accordance with Assembly Bill 32, and associated issues of climate change.

Because the outcome of the Parties' dispute is uncertain, and to allow the Stockton General Plan to go forward while still addressing the concerns of the Attorney General and the Sierra Club, the Parties have agreed to resolve their dispute by agreement, without the need for judicial resolution.

The parties want to ensure that the General Plan and the City's implementing actions address GHG reduction in a meaningful and constructive manner. The parties recognize that development on the urban fringe of the City must be carefully balanced with accompanying infill development to be consistent with the state mandate of reducing GHG emissions, since unbalanced development will cause increased driving and increased motor vehicle GHG emissions. Therefore, the parties want to promote balanced development, including adequate infill development, downtown vitalization, affordable housing, and public transportation. In addition, the parties want to ensure that development on the urban fringe is as revenue-neutral to the City as to infrastructure development and the provision of services as possible.

In light of all the above considerations, the Parties agree as follows, recognizing that any legislative actions contemplated by the Agreement require public input and, in some instances, environmental review prior to City Council actions, which shall reflect such input and environmental information, pursuant to State law:

AGREEMENT

Climate Action Plan

1. Within 24 months of the signing of this Agreement, and in furtherance of General Plan Policy HS-4.20 and other General Plan policies and goals, the City agrees that its staff shall prepare and submit for City Council adoption, a Climate Action Plan, either as a separate element of the General Plan or as a component of an existing General Plan element. The Climate Action Plan, whose adoption will be subject to normal requirements for compliance with CEQA and other controlling state law, shall include, at least, the measures set forth in paragraphs 3 through 8, below.

2. The City shall establish a volunteer Climate Action Plan advisory committee to assist the staff in its preparation and implementation of the Plan and other policies or documents to be adopted pursuant to this Agreement. This committee shall monitor the City's compliance with this Agreement, help identify funding sources to implement this Agreement, review in a timely manner all draft plans and policy statements developed in accordance with this Agreement (including studies prepared pursuant to Paragraph 9, below), and make recommendations to the Planning Commission and City Council regarding its review. The committee shall be comprised of one representative from each of the following interests: (1) environmental, (2) non-profit community organization, (3) labor, (4) business, and (5) developer. The committee members shall be selected by the City Council within 120 days of the Effective Date, and shall serve a one-year term, with no term limits. Vacancies shall be filled in accordance with applicable City policies. The City shall use its best efforts to facilitate the committee's work using available staff resources.

3. The Climate Action Plan shall include the following measures relating to GHG inventories and GHG reduction strategies:

a. Inventories from all public and private sources in the City:

(1) Inventory of current GHG emissions as of the Effective Date;

(2) Estimated inventory of 1990 GHG emissions;

(3) Estimated inventory of 2020 GHG emissions.

The parties recognize that techniques for estimating the 1990 and 2020 inventories are imperfect; the City agrees to use its best efforts, consistent with methodologies developed by ICLEI and the California Air Resources

Board, to produce the most accurate and reliable inventories it can without disproportionate or unreasonable staff commitments or expenditures.

b. Specific targets for reductions of the current and projected 2020 GHG emissions inventory from those sources of emissions reasonably attributable to the City's discretionary land use decisions and the City's internal government operations. Targets shall be set in accordance with reduction targets in AB 32, other state laws, or applicable local or regional enactments addressing GHG emissions, and with Air Resources Board regulations and strategies adopted to carry out AB 32, if any, including any local or regional targets for GHG reductions adopted pursuant to AB 32 or other state laws. The City may establish goals beyond 2020, consistent with the laws referenced in this paragraph and based on current science.

c. A goal to reduce per capita vehicle miles traveled ("VMT") attributable to activities in Stockton (i.e., not solely due to through trips that neither originate nor end in Stockton) such that the rate of growth of VMT during the General Plan's time frame does not exceed the rate of population growth during that time frame. In addition, the City shall adopt and carry out a method for monitoring VMT growth, and shall report that information to the City Council at least annually. Policies regarding VMT control and monitoring that the City shall consider for adoption in the General Plan are attached to this Agreement in Exhibit A.

d. Specific and general tools and strategies to reduce the current and projected 2020 GHG inventories and to meet the Plan's targets for GHG reductions by 2020, including but not limited to the measures set out in paragraphs 4 through 8, below.

4. The City agrees to take the following actions with respect to a green building program:

a. Within 12 months of the Effective Date, the City staff shall submit for City Council adoption ordinance(s) that require:

(1) All new housing units to obtain Build It Green certification, based on then-current Build It Green standards, or to comply with a green building program that the City after consultation with the Attorney General, determines is of comparable effectiveness;

(2) All new non-residential buildings that exceed 5000 square feet and all new municipal buildings that exceed 5000 square feet to be certified to LEED Silver standards at a minimum, based on the then-current LEED standards, or to comply with a green building program that the City, after consultation with the Attorney General, determines is of comparable effectiveness;

(3) If housing units or non-residential buildings certify to standards other than, but of comparable effectiveness to, Build It Green or LEED Silver, respectively, such housing units or buildings shall demonstrate, using an outside inspector or verifier certified under the California Energy Commission Home Energy Rating System (HERS), or a comparably certified verifier, that they comply with the applicable standards.

(4) The ordinances proposed for adoption pursuant to paragraphs (1) through (3) above may include an appropriate implementation schedule, which, among other things, may provide that LEED Silver requirements (or standards of comparable effectiveness) for non-residential buildings will be implemented first for buildings that exceed 20,000 square feet, and later for non-residential buildings that are less than 20,000 and more than 5,000 square feet.

(5) Nothing in this section shall affect the City's obligation to comply with applicable provisions of state law, including the California Green Building Standards Code (Part 11 of Title 24 of the California Code of Regulations), which, at section 101.7, provides, among other things, that "local government entities retain their discretion to exceed the standards established by [the California Green Building Standards Code]."

b. Within 18 months of the Effective Date, the City staff shall submit for City Council adoption ordinance(s) that will require the reduction of the GHG emissions of existing housing units on any occasion when a permit to make substantial modifications to an existing housing unit is issued by the City.

c. The City shall explore the possibility of creating a local assessment district or other financing mechanism to fund voluntary actions by owners of commercial and residential buildings to undertake energy efficiency

measures, install solar rooftop panels, install "cool" (highly reflective) roofs, and take other measures to reduce GHG emissions.

d. The City shall also explore the possibility of requiring GHG-reducing retrofits on existing sources of GHG emissions as potential mitigation measures in CEQA processes.

e. From time to time, but at least every five years, the City shall review its green building requirements for residential, municipal and commercial buildings, and update them to ensure that they achieve performance objectives consistent with those achieved by the top (best-performing) 25% of city green building measures in the state.

5. Within 12 months of the Effective Date, the City staff shall submit for City Council adoption a transit program, based upon a transit gap study. The transit gap study shall include measures to support transit services and operations, including any ordinances or general plan amendments needed to implement the transit program. These measures shall include, but not be limited to, the measures set forth in paragraphs 5.b. through 5.d. In addition, the City shall consider for adoption as part of the transit program the policy and implementation measures regarding the development of Bus Rapid Transit ("BRT") that are attached to this Agreement in Exhibit B.

a. The transit gap study, which may be coordinated with studies conducted by local and regional transportation agencies, shall analyze, among other things, strategies for increasing transit usage in the City, and shall identify funding sources for BRT and other transit, in order to reduce per capita VMT throughout the City. The study shall be commenced within 120 days of the Effective Date.

b. Any housing or other development projects that are (1) subject to a specific plan or master development plan, as those terms are defined in §§ 16-540 and 16-560 of the Stockton Municipal Code as of the Effective Date (hereafter "SP" or "MDP"), or (2) projects of statewide, regional, or areawide significance, as defined by the CEQA Guidelines (hereafter "projects of significance"), shall be configured, and shall include necessary street design standards, to allow the entire development to be internally accessible by vehicles, transit, bicycles, and pedestrians, and to allow access to adjacent neighborhoods and developments by all such modes of transportation.

c. Any housing or other development projects that are (1) subject to an SP or MDP, or (2) projects of significance, shall provide financial and/or other

support for transit use. The imposition of fees shall be sufficient to cover the development's fair share of the transit system and to fairly contribute to the achievement of the overall VMT goals of the Climate Action Plan, in accordance with the transit gap study and the Mitigation Fee Act (Government Code section 66000, *et seq.*), and taking into account the location and type of development. Additional measures to support transit use may include dedication of land for transit corridors, dedication of land for transit stops, or fees to support commute service to distant employment centers the development is expected to serve, such as the East Bay. Nothing in this Agreement precludes the City and a landowner/applicant from entering in an agreement for additional funding for BRT.

d. Any housing or other development projects that are (1) subject to an SP or MDP or (2) projects of significance, must be of sufficient density overall to support the feasible operation of transit, such density to be determined by the City in consultation with San Joaquin Regional Transit District officials.

6. To ensure that the City's development does not undermine the policies that support infill and downtown development, within 12 months of the Effective Date, the City staff shall submit for City Council adoption policies or programs in its General Plan that:

a. Require at least 4400 units of Stockton's new housing growth to be located in Greater Downtown Stockton (defined as land generally bordered by Harding Way, Charter Way (MLK), Pershing Avenue, and Wilson Way), with the goal of approving 3,000 of these units by 2020.

b. Require at least an additional 14,000 of Stockton's new housing units to be located within the City limits as they exist on the Effective Date ("existing City limits").

c. Provide incentives to promote infill development in Greater Downtown Stockton, including but not limited to the following for proposed infill developments: reduced impact fees, including any fees referenced in paragraph 7 below; lower permit fees; less restrictive height limits; less restrictive setback requirements; less restrictive parking requirements; subsidies; and a streamlined permitting process.

d. Provide incentives for infill development within the existing City limits but outside Greater Downtown Stockton and excluding projects of significance. These incentives may be less aggressive than those referenced in paragraph 6.c., above.

7. Within 12 months of the Effective Date, the City staff shall submit for City Council adoption amendments to the General Plan to ensure that development at the City's outskirts, particularly residential, village or mixed use development, does not grow in a manner that is out of balance with development of infill. These proposed amendments shall include, but not be limited to, measures limiting the granting of entitlements for development projects outside the existing City limits and which are (1) subject to an SP or MDP, or (2) projects of significance, until certain criteria are met. These criteria shall include, at a minimum:

a. Minimum levels of transportation efficiency, transit availability (including BRT) and Level of Service, as defined by the San Joaquin Council of Government regulations, City service capacity, water availability, and other urban services performance measures;

b. Firm, effective milestones that will assure that specified levels of infill development, jobs-housing balance goals, and GHG and VMT reduction goals, once established, are met before new entitlements can be granted;

c. Impact fees on new development, or alternative financing mechanisms identified in a project's Fiscal Impact Analysis and/or Public Facilities Financing Plan, that will ensure that the levels and milestones referenced in paragraphs 7.a. and 7.b., above, are met. Any such fees:

(1) shall be structured, in accordance with controlling law, to ensure that all development outside the infill areas within existing City limits is revenue-neutral to the City (which may necessitate higher fees for development outside this area, depending upon the costs of extending infrastructure);

(2) may be in addition to mitigation measures required under CEQA;

(3) shall be based upon a Fiscal Impact Analysis and a Public Facilities Financing Plan.

d. The City shall explore the feasibility of enhancing the financial viability of infill development in Greater Downtown Stockton, through the use of such mechanisms as an infill mitigation bank.

8. The City shall regularly monitor the above strategies and measures to ensure that they are effectively reducing GHG emissions. In addition to the City staff reporting on VMT annually, as provided in paragraph 3.c., the City staff or the advisory committee shall report annually to the City Council on the City's progress in implementing the

strategies and measures of this Agreement. If it appears that the strategies and measures will not result in the City meeting its GHG reduction targets, the City shall, in consultation with the Attorney General and Sierra Club, make appropriate modifications and, if necessary, adopt additional measures to meet its targets.

Early Climate Protection Actions

9. To more fully carry out those provisions of the General Plan, including the policy commitments embodied in those General Plan Policies, such as General Plan Policy HS-4.20, intended to reduce greenhouse gas emissions through reducing commuting distances, supporting transit, increasing the use of alternative vehicle fuels, increasing efficient use of energy, and minimizing air pollution, and to avoid compromising the effectiveness of the measures in Paragraphs 4 through 8, above, until such time as the City formally adopts the Climate Action Plan, before granting approvals for development projects (1) subject to an SP or MDP, or (2) considered projects of significance, and any corresponding development agreements, the City shall take the steps set forth in subsections (a) through (d) below:

(a) City staff shall:

(1) formulate proposed measures necessary for the project to meet any applicable GHG reduction targets;

(2) assess the project's VMT and formulate proposed measures that would reduce the project's VMT;

(3) assess the transit, especially BRT, needs of the project and identify the project's proposed fair share of the cost of meeting such needs;

(4) assess whether project densities support transit, and, if not, identify proposed increases in project density that would support transit service, including BRT service;

(5) assess the project's estimated energy consumption, and identify proposed measures to ensure that the project conserves energy and uses energy efficiently;

(6) formulate proposed measures to ensure that the project is consistent with a balance of growth between land within Greater Downtown Stockton and existing City limits, and land outside the existing City limits;

(7) formulate proposed measures to ensure that City services and infrastructure are in place or will be in place prior to the issuance of new entitlements for the project or will be available at the time of development; and

(8) formulate proposed measures to ensure that the project is configured to allow the entire development to be internally accessible by all modes of transportation.

(b) The City Council shall review and consider the studies and recommendations of City staff required by paragraph 9(a) and conduct at least one public hearing thereon prior to approval of the proposed project (though this hearing may be folded into the hearing on the merits of the project itself).

(c) The City Council shall consider the feasibility of imposing conditions of approval, including mitigation measures pursuant to CEQA, based on the studies and recommendations of City staff prepared pursuant to paragraph 9(a) for each covered development project.

(d) The City Council shall consider including in any development approvals, or development agreements, that the City grants or enters into during the time the City is developing the Climate Action Plan, a requirement that all such approvals and development agreements shall be subject to ordinances and enactments adopted after the effective date of any approvals of such projects or corresponding development agreements, where such ordinances and enactments are part of the Climate Action Plan.

(e) The City shall complete the process described in paragraphs (a) through (d) (hereinafter, "Climate Impact Study Process") prior to the first discretionary approval for a development project. Notwithstanding the foregoing, however, for projects for which a draft environmental impact report has circulated as of the Effective Date, the applicant may request that the City either (i) conduct the Climate Impact Study Process or (ii) complete its consideration of the Climate Action Plan prior to the adoption of the final discretionary approval leading to the project's first phase of construction. In such cases, the applicant making the request shall agree that nothing in the discretionary approvals issued prior to the final discretionary approval (i) precludes the City from imposing on the project conditions of approvals or other measures that may result from the Climate Impact Study Process, or (ii) insulates the project from a decision, if any, by the City to apply any ordinances and/ or enactments that may comprise the Climate Action Plan

ultimately adopted by the City.

Attorney General Commitments

10. The Attorney General enters into this Agreement in his independent capacity and not on behalf of any other state agency, commission, or board. In return for the above commitments made by the City, the Attorney General agrees:

a. To refrain from initiating, joining, or filing any brief in any legal challenge to the General Plan adopted on December 11, 2007;

b. To consult with the City and attempt in good faith to reach an agreement as to any future development project whose CEQA compliance the Attorney General considers inadequate. In making this commitment, the Attorney General does not surrender his right and duties under the California Constitution and the Government Code to enforce CEQA as to any proposed development project, nor his duty to represent any state agency as to any project;

c. To make a good faith effort to assist the City in obtaining funding for the development of the Climate Action Plan.

Sierra Club Commitments

11. The Sierra Club agrees to dismiss the Sierra Club Action with prejudice within ten (10) days of the Effective Date. Notwithstanding the foregoing agreement to dismiss the Sierra Club Action, the City and Sierra Club agree that, in the event the City should use the EIR for the 2035 General Plan in connection with any other project approval, the Sierra Club has not waived its right (a) to comment upon the adequacy of that EIR, or (b) to file any action challenging the City's approval of any other project based on its use and/or certification of the EIR.

General Terms and Conditions

12. This Agreement represents the entire agreement of the Parties, and supercedes any prior written or oral representations or agreements of the Parties relating to the subject matter of this Agreement.

13. No modification of this Agreement will be effective unless it is set forth in writing and signed by an authorized representative of each Party.

14. Each Party warrants that it has the authority to execute this Agreement. Each Party warrants that it has given all necessary notices and has obtained all necessary consents to permit it to enter into and execute this Agreement.

15. This Agreement shall be governed by and construed in accordance with the laws of the State of California.

16. This Agreement may be executed in counterparts, each of which shall be deemed an original. This Agreement will be binding upon the receipt of original, facsimile, or electronically communicated signatures.

17. This Agreement has been jointly drafted, and the general rule that it be construed against the drafting party is not applicable.

18. If a court should find any term, covenant, or condition of this Agreement to be invalid or unenforceable, the remainder of the Agreement shall remain in full force and effect.

19. The City agrees to indemnify and defend the Sierra Club, its officers and agents (collectively, "Club") from any claim, action or proceeding ("Proceeding") brought against the Club, whether as defendant/respondent, real party in interest, or in any other capacity, to challenge or set aside this Agreement. This indemnification shall include (a) any damages, fees, or costs awarded against the Club, and (b) any costs of suit, attorneys' fees or expenses incurred in connection with the Proceeding, whether incurred by the Club, the City or the parties bringing such Proceeding. If the Proceeding is brought against both the Club and the City, the Club agrees that it may be defended by counsel for the City, provided that the City selects counsel that is acceptable to the Club; the Club may not unreasonably withhold its approval of such mutual defense counsel.

20. The City shall pay Sierra Club's attorney's fees and costs in the amount of $157,000 to the law firm of Shute, Mihaly & Weinberger LLP as follows: $50,000 within 15 days of dismissal of the Sierra Club Action, and (b) the balance on or before January 30, 2009.

21. Any notice given under this Agreement shall be in writing and shall be delivered as follows with notice deemed given as indicated: (a) by personal delivery when delivered personally; (b) by overnight courier upon written verification of receipt; or (c) by certified or registered mail, return receipt requested, upon verification of receipt. Notice shall be sent as set forth below, or as either party may specify in writing:

City of Stockton: Attorney General's Office

Richard E. Nosky, City Attorney
425 N. El Dorado Street, 2nd Floor
Stockton, CA 95202

Lisa Trankley
Susan Durbin
Deputy Attorneys General
1300 I Street, P.O. Box 944255
Sacramento, CA 94255-2550

Sierra Club:
Aaron Isherwood
Environmental Law Program
85 Second Street, 2nd Floor
San Francisco, CA 94105

Rachel Hooper
Amy Bricker
Shute, Mihaly & Weinberger
396 Hayes Street
San Francisco, CA 94102

22. Nothing in this Agreement shall be construed as requiring the City to relinquish or delegate its land use authority or police power.

(SIGNATURES ON FOLLOWING PAGE)

In witness whereof, this Agreement is executed by the following:

PEOPLE OF THE STATE OF CALIFORNIA
BY AND THROUGH ATTORNEY GENERAL
EDMUND G. BROWN JR.

Lisa Trankley

DATED: 10/14/08

ATTEST:

KATHERINE GONG MEISSNER
City Clerk of the City of Stockton

CITY OF STOCKTON,
a municipal corporation

J. GORDON PALMER, JR.
City Manager

DATED 9/25/08

APPROVED AS TO FORM:

RICHARD E. NOSKY, JR.
City Attorney

DATED 9-9-08

THE SIERRA CLUB

BARBARA WILLIAMS, CHAIR
MOTHER LODE CHAPTER

DATED

In witness whereof, this Agreement is executed by the following:

PEOPLE OF THE STATE OF CALIFORNIA
BY AND THROUGH ATTORNEY GENERAL
EDMUND G. BROWN JR.

_____

DATED: _____

ATTEST:

_____
KATHERINE GONG MEISSNER
City Clerk of the City of Stockton

APPROVED AS TO FORM:

_____
RICHARD E. NOSKY, JR.
City Attorney

DATED _____

CITY OF STOCKTON,
a municipal corporation

_____
J. GORDON PALMER, JR.
City Manager

DATED _____

THE SIERRA CLUB

Barbara Williams
BARBARA WILLIAMS, CHAIR
MOTHER LODE CHAPTER

DATED 10/11/08

EXHIBIT A

Policy Re: VMT Monitoring Program

The City's policy is to monitor key City-maintained roadways to estimate Vehicle Miles Traveled (VMT) by single-occupant automobile per capita on an annual basis, to be submitted as an annual report to the City Council. The estimate of citywide VMT should be developed in cooperation with the San Joaquin Council of Governments (**"**SJCOG**"**), by augmenting local City data with VMT estimates from SJCOG and Caltrans for the regional Congestion Management Plan network. The estimated change in annual VMT should be used to measure the effectiveness of jobs/housing balance, greenhouse gas emission reduction, and transit plans and programs.

Implementation Program

In order to develop an annual estimate of citywide VMT, the City should augment local City data with VMT estimates from SJCOG and Caltrans for regional facilities, or adopt other methodologies to estimate citywide VMT that are approved in concept by the two agencies. For purposes of calculating annual changes in VMT, the annual estimate of VMT should subtract out the estimates of regional truck and other through traffic on the major freeways (I-5, SR 4, SR 99).

Policy Re: Reduce Growth in VMT

The City's policy is to achieve the following fundamental goals to regulate vehicle emissions and reduce greenhouse gas emissions, improve jobs/housing balance, and increase transit usage over the duration of this General Plan: Reduce the projected increase in VMT by single-occupant automobile per capita to an annual rate over the planning period that is equal to or less than the population increase (this goal is also required for the City to receive funding through the Measure K/Congestion Management Plan program).

Implementation Program

In order to keep annual increases in VMT to a rate equal to or less than population increases, the following trip reduction programs should be considered by the City: increased transit service (Bus Rapid Transit) funded through new development fees; planning all future housing development to be in the closest possible proximity to existing and planned employment centers; provision of affordable housing; creation of higher density, mixed use and walkable communities and development of bicycle and pedestrian trails; and other proven programs.

Implementation Program

If the City goal of reducing the projected increase in VMT to an amount equal to or less than the population increase, and increase transit usage, is not met for two or more years during each five-year cycle of VMT monitoring, the City should consider adoption of the following programs, among others:

Adopt more vigorous economic development programs with funding for staff; and

Slow the rate of approvals of building permits for housing developments.

EXHIBIT B

Policy Re: Bus Rapid Transit

The City's policy is to vigorously support efforts to develop Bus Rapid Transit (BRT) within and beyond Stockton as a major priority of its General Plan, in order to increase overall transit usage over time. Based on an updated transit study, the City should plan for and provide BRT service running along key north-south routes as a first priority: Pacific Avenue; El Dorado Street; West Lane/Airport Way; Pershing Avenue. BRT service along key east-west corridors should also be provided. Transit use goals should be approved and monitored by the City over the planning period.

Implementation Program

In order to fund the initial capital and operating costs for BRT along major north-south arterials, the City should consider adoption of a comprehensive new development BRT fee program that requires new growth to significantly fund BRT, following a study consistent with the requirements of State law. The new development BRT fee program should ensure that "greenfield" projects approved at the fringe of the City pay a fee that represents the full cost of providing BRT service to the new housing; infill development may be granted a reduced BRT fee based on the reduced distance of service provided to the inner city areas.

Implementation Program

In order to augment the new development funding of the initial capital and operating costs for BRT, the City should strongly advocate for Measure K funding and should seriously consider placing an initiative on the ballot to receive voter approval for additional funding from existing residents and businesses.

Implementation Program

The City should establish transit use goals that set specific targets (e.g., transit mode split percentage of total trips and bus headways) that represent an increase in public transportation ridership and level of service over current levels by 2012 and then another increase by 2018.

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CITY OF STOCKTON

OFFICE OF THE CITY MANAGER
City Hall • 425 N. El Dorado Street • Stockton, CA 95202-1997 • 209/937-8212 • Fax 209/937-7149
www.stocktongov.com

October 7, 2008

Alliance for Responsible Planning
6507 Pacific Avenue
Box 339
Stockton, CA 95207

SETTLEMENT AGREEMENT WITH ATTORNEY GENERAL AND SIERRA CLUB

As you are aware, on September 9, 2008, the City of Stockton approved a Memorandum of Agreement with the Sierra Club and the California Attorney General's Office resolving litigation over the City's 2035 General Plan. The Alliance for Responsible Planning and other interested parties have raised questions about the parties' interpretation of the Agreement and the public process that the City plans to follow in carrying out the Agreement. To help answer these questions, below we clarify our interpretation of the Agreement and also elaborate on the public process that the City will follow in implementing the provisions of the Agreement. We understand that the other parties to the Agreement concur in these views. Note that many of the statements below reiterate points that were made in the City's Resolution adopted in connection with its approval of the Agreement and in statements made by the parties during the August 26, 2008, and September 9, 2008, City Council hearings about the Agreement:

1. The parties understand and acknowledge the importance of public involvement in the process of developing the General Plan, and encourage the continued significant involvement of the public in the development of greenhouse gas reduction polices. The City intends to provide for public involvement in the development of the programs, policies, General Plan amendments and ordinances proposed by the Agreement. The City also will provide reasonable notification to the public of all Advisory Committee, Planning Commission and City Council meetings involving consideration of the issues provided for by the Agreement. It is the City's expectation to expand the composition of the Climate Action Advisory Committee to include a total of two representatives from each of the following interests: (1) environmental, (2) non-profit community organization, (3) labor, (4) business, and (5)

Stockton
All-America City
2004
1999

developer. The City will fully comply with CEQA in connection with the development of the programs, policies, General Plan amendments and ordinances proposed by the Agreement.

2. The parties understand and acknowledge that the public review process and compliance with CEQA may require additional time beyond designated time periods to ensure the full involvement of the public in the consideration of the Climate Action Plan, green building program and transit study and to ensure full compliance with CEQA.

3. The parties understand and acknowledge that the adoption of the programs, policies, General Plan amendments and ordinances proposed by the Agreement are discretionary legislative acts and the City is not required by the terms of the Agreement to adopt any particular program, policy, General Plan amendment or ordinance. In addition, nothing in the Agreement shall limit or restrict the right of the City to modify, alter, or rescind any particular program, policy, General Plan amendment or ordinance following the adoption of such program, policy, General Plan amendment or ordinance. Although the Agreement requires City staff to present to the City Council certain programs, policies, General Plan Amendments and ordinances for its consideration, nothing in the Agreement limits or restricts City staff from providing to the City Council additional, alternative recommendations for such programs, policies, General Plan amendments and ordinances based on staff professional judgment, public input and CEQA review.

4. The parties understand and acknowledge that if there is an instance in which the terms of the written Agreement are unclear, the Resolution adopted by the City Council on September 9, 2008, and the statements made by the Attorney General's office, the Sierra Club and our City Attorney and the City's outside counsel at the August 26 and September 9, 2008, City Council hearings provide a legislative history pursuant to which the Agreement should be interpreted.

5. The parties understand and acknowledge that:
   (i) upon consideration of a Climate Action Plan (CAP) by the Council, the City's obligations under Agreement paragraphs 3 through 7 will be discharged,
   (ii) upon adoption of a CAP, the City's obligations under Agreement paragraph 9 will be discharged, and
   (iii) upon inclusion of a program in the CAP to regularly monitor and, if appropriate, modify the City's strategies and measures to meet the Greenhouse Gas reduction targets that may be adopted in the

CAP, the City's obligations under paragraph 8 will be discharged. Nothing in this paragraph 5 is intended to contradict our clarification in paragraph 3, above, that the City retains full legislative discretion with respect to any policies, programs and ordinance it may adopt as part of a CAP.

J. GORDON PALMER, JR.
CITY MANAGER

JGP:REN:cn

cc: Edward J. Chavez
Richard E. Nosky, Jr.
George Mihlsten (Via e-mail)
Cliff Rechtschaffen (Via e-mail)
Rachel Hooper (Via e-mail)

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Attorney General

State of California
DEPARTMENT OF JUSTICE

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October 7, 2008

Alliance for Responsible Planning
6507 Pacific Avenue
Box 339
Stockton, CA 95207

RE: Stockton General Plan Settlement
Clarification Letters

Dear Alliance Members:

The Attorney General's Office has read the letter from Stockton City Manager Gordon Palmer to the Alliance for Responsible Planning (copy attached). We concur in the City's interpretation and understanding of the Memorandum of Agreement as set forth in the letter.

If you have questions, please contact the undersigned.

Sincerely,

CLIFF RECHTSCHAFFEN
Special Assistant Attorney General

For EDMUND G. BROWN JR.
Attorney General

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URBAN PLANNERS

October 7, 2008

Via U.S. Mail

Alliance for Responsible Planning
6507 Pacific Avenue
Box 339
Stockton, CA 95207

Re: Stockton General Plan Settlement Clarification Letters

Dear Alliance:

On behalf of the Sierra Club, we have read the letter from Stockton City Manager Gordon Palmer to the Alliance for Responsible Planning (copy attached). The Sierra Club concurs in the City's interpretation and understanding of the Memorandum of Agreement as set forth in the letter.

SHUTE, MIHALY, & WEINBERGER LLP

Yours very truly,

Rachel B. Hooper

Rachel B. Hooper

Enclosure
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Alliance for Responsible Planning

8507 Pacific Avenue
Box 338
Stockton, CA 95207

October 7, 2008

Honorable Mayor Ed Chavez and City Councilmembers
425 N. El Dorado St, 2nd Floor
Stockton, CA 95202

Honorable Mayor and Councilmembers:

We are pleased to receive a copy of a letter from Gordon Palmer, City Manager, outlining a series of clarifications regarding the Memorandum of Agreement entered into by the City with the Attorney General and the Sierra Club. The letter from Mr. Palmer sets forth important clarifications to the Agreement which have been concurred in by the Attorney General and the Sierra Club.

These clarifications provide clear assurances to the Alliance and the public as to a number of critical issues that have been of concern to the Alliance. In particular, the letter makes very clear the importance of significant public involvement in the consideration of a Climate Action Plan. We strongly support the possible expansion of the number of members of the proposed Advisory Committee and look forward to participating in that process.

In addition, the Alliance agrees that alternative recommendations can be presented to the City Council based on public input and the California Environmental Quality Act. This helps to ensure the credibility of the public process. Lastly, the letter underscores the clear understanding of the parties to the Agreement that the adoption of a Climate Action Plan is in the legislative discretion of the City.

In light of the discussions undertaken in good faith among the parties and the Alliance, the statements made in Mr. Palmer's letter, and the concurrence of the Attorney General and the Sierra Club to the letter from the City Manager, we have decided to withdraw our effort to seek a referendum of the Agreement pursuant to the authorization contained in Section 9604 of the Elections Code. These statements by the City and the other parties address the core issues we have heard from the community. In accordance with section 9604, we will provide written notice to the City Clerk of the withdrawal of the referendum. In addition, we will not be pursuing a legal challenge to the adoption of the Agreement by the City nor will we promote or fund any individuals or entities challenging the adoption of the Agreement or promoting a referendum of the Agreement. We, of course, reserve our rights to challenge the implementation of the Agreement.

We are proud of the 25,000 Stocktonians who participated in this process. We thank the City Manager, the City Attorney, the Attorney General and the Sierra Club for providing these clarifications. It is sincerely appreciated.

We look forward to working with the City and the community in undertaking development of a Climate Action Plan. In addition, the Alliance looks forward to continuing to work with the community and the City on other issues affecting the City's future.

Sincerely,

Gary Podesto

A.G. Spanos Companies

October 7, 2008

Honorable Mayor Ed Chavez and Councilmembers
425 N. El Dorado St., 2nd Floor
Stockton, CA 95202

Honorable Mayor and Councilmembers:

We have had a chance to review the letter from the City Manager dated October 7, 2008 and letters from the Attorney General and the Sierra Club. These letters provide a number of critical clarifications with respect to the Memorandum of Agreement approved by the City on September 9, 2008.

In particular:

- All parties have recognized the need for significant community involvement in the consideration of a Climate Action Plan. The A. G. Spanos Companies strongly supports the City's stated expectation to expand the number of members of the proposed Advisory Committee, and we look forward to participating in that process.
- Second, all parties have it clear that alternative recommendations can be presented to the City Council based on public input and the California Environmental Quality Act. This helps to ensure the credibility of the public process.
- Finally, all parties to the Agreement acknowledge that the adoption of a Climate Action Plan is in the legislative discretion of the City.

In light of these statements by Mr. Palmer and the concurrence of the other parties regarding a significant public process and assurances regarding the independent discretion of the City in developing and considering a Climate Action Plan, we will not be pursuing a legal challenge to the adoption of the Agreement by the City and will not fund or support any efforts by any other individuals or entities to file a legal challenge to the adoption of the Agreement or to seek a referendum with regard to the adoption of the Agreement. We, of course, reserve our rights to challenge the implementation of the Agreement.

We look forward to working with the community and the City in developing a Climate Action Plan. We are prepared to work with the City and the Alliance to develop a comprehensive public outreach program to ensure the community's significant involvement in the process.

Sincerely,

David Nelson
A.G. Spanos Companies

10100 Trinity Parkway, 5th Floor Stockton, California 95219 Telephone: 209.478.7954 Fax: 209.478.3309

Description of Revisions Made to Address Comments in Disability Rights California August 18, 2023 Letter

Comment: The City of Stockton's Revised Housing Element Contains Zero Plans for Permanent Housing for Stockton's 5,000 and Counting Houseless Individuals

Response: Revisions were made to pages BR-39 through BR-40 in the Existing Needs Assessment.

Comment: The City's Revised Housing Element has Zero Programs to Prevent Displacement of Stockton's Tenants Who Comprise Half of All Households in Stockton – Approximately 150,000 Households.

- Tenant Protection Policies

  Response: No additional revisions were made to address this comment.

- Housing Preservation and Affordable Housing Development Program

  Response: No additional revisions were made to address this comment.

- The City's Value Capture Programs are Inadequate or Unlawful

  Response: Program 7 in the Policy Document was revised to remove the market rate density bonus concept.

- The City's Current Housing Element Does Not Plan for Supportive, Accessible, Safe, Non-segregated Housing for Stocktonians with Disabilities.

  Response: Revisions were made to Programs 26 and 29 in the Policy Document to include targeted outreach and efforts for those with disabilities

Comment: Transportation for people with Disabilities is an AFFH issue.

Response: No additional revisions were made to address this comment.

Comment: The City's Current Draft Sites Inventory Will Not Satisfy HCD Requirements for AFFH Because Plans for Low Income Housing and Extremely Low Income Housing Only in Stockton. Not Only Fails to Address the History of Racial Segregation in Stockton, it also Fails to Meet Requirements for the Environmental Element.

Response Program 33 has been added to the Policy Document to call on the City to identify additional sites in higher resourced areas of the City to address this comment.

CITY OF STOCKTON

CITY OF STOCKTON

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